

Rebecca Terry vs County of Milwaukee, et al.

17-CV-01112

Transcript of the Testimony of:

REBECCA TERRY

June 01, 2018

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

REBECCA TERRY,

Plaintiff,

vs.

Case No. 17-CV-01112

COUNTY OF MILWAUKEE, et al.,

Defendants.

Videotaped Deposition of REBECCA TERRY

Friday, June 1, 2018

12:00 p.m.

at

LEIB KNOTT GAYNOR LLC
219 North Milwaukee Street, Suite 710
Milwaukee, Wisconsin

Reported by Carla J. Van Roo, RPR, CRR

<p style="text-align: center;">Page 2</p> <p>Videotaped Deposition of REBECCA TERRY, a witness in the above-entitled action, at the instance of the Defendants, pursuant to the rules of Federal Procedure, before Carla J. Van Roo, Registered Professional Reporter and Certified Realtime Reporter, in and for the State of Wisconsin, at the aforementioned location noted on previous page, held on June 1, 2018, commencing at 12:00 p.m. and concluding at 6:45 p.m.</p> <p>A P P E A R A N C E S:</p> <p>LOEVY & LOEVY MS. THERESA KLEINHAUS 311 North Aberdeen, Third Floor Chicago, Illinois, 60607 Appeared on behalf of the Plaintiffs</p> <p>LEIB KNOTT GAYNOR LLC, by MR. DOUGLAS KNOTT and MR. RANDAL N. ARNOLD 219 North Milwaukee Street, Suite 710 Milwaukee, Wisconsin, 53202</p> <p>HINSHAW & CULBERTSON LLP, by MR. MICHAEL RUSSART 100 East Wisconsin Avenue, Suite 2600 Milwaukee, Wisconsin, 53202 Appeared on behalf of Armor Correctional</p> <p>ALSO PRESENT: Mr. Tim D'Agostino, Videographer</p>	<p style="text-align: right;">Page 4</p> <p>1 T R A N S C R I P T O F P R O C E E D I N G S 2 (Exhibit No. 1-15 were marked for 3 identification.) 4 THE VIDEOGRAPHER: Good afternoon. We are 5 on the record. This is the videotaped deposition of 6 Rebecca Terry in the matter of Rebecca Terry versus 7 County of Milwaukee, et al. Case No. 17-CV-1112. 8 This deposition is taking place at 9 219 North Milwaukee Street, Suite 710, Milwaukee 10 Wisconsin, on June 1, 2018, at 12:11 p.m. 11 My name is Tim D'Agostino, I'm the 12 videographer with U.S. Legal Support located at 740 13 North Plankinton, Milwaukee, Wisconsin. 14 The video and audio recording will be 15 taking place unless all counsel agree to go off the 16 record. 17 Will counsel state their appearances for 18 the record and who they represent, starting with the 19 plaintiff, and then the court reporter will swear in 20 the witness. 21 MS. KLEINHAUS: Theresa Kleinhaus appearing 22 on behalf of Rebecca Terry. 23 MR. KNOTT: Doug Knott on behalf of the 24 Milwaukee County defendants. 25 MR. RUSSART: Attorney Michael Russart</p>																				
<p style="text-align: center;">Page 3</p> <p style="text-align: center;">I N D E X</p> <table border="0"> <tr> <td>EXAMINATION</td> <td>PAGE</td> </tr> <tr> <td>BY MR. KNOTT</td> <td>5</td> </tr> </table> <p style="text-align: center;">E X H I B I T S</p> <table border="0"> <tr> <td>EXHIBIT NO.</td> <td>PAGE IDENTIFIED</td> </tr> <tr> <td>Exh. 1 - Notice of Deposition</td> <td>48</td> </tr> <tr> <td>Exh. 2 - Milwaukee County Correctional Health Services Report Bates Armor 629-635</td> <td>185</td> </tr> <tr> <td>Exh. 3 - Milwaukee County Correctional Health Services Report Bates Armor 615-623</td> <td>190</td> </tr> <tr> <td>Exh. 4 - Milwaukee County Correctional Health Services Report Bates Armor 572-615</td> <td>195</td> </tr> <tr> <td>Exh. 10 - Discharge Summary Bates Terry 316</td> <td>134</td> </tr> <tr> <td>Exh. 11 - LD Flowsheet Bates Terry 308</td> <td>114</td> </tr> <tr> <td>Exh. 12 - Interrogatories</td> <td>179</td> </tr> </table> <p>(Exhibits 5-9 and 13-15 marked but not identified and retained by Mr. Knott.)</p>	EXAMINATION	PAGE	BY MR. KNOTT	5	EXHIBIT NO.	PAGE IDENTIFIED	Exh. 1 - Notice of Deposition	48	Exh. 2 - Milwaukee County Correctional Health Services Report Bates Armor 629-635	185	Exh. 3 - Milwaukee County Correctional Health Services Report Bates Armor 615-623	190	Exh. 4 - Milwaukee County Correctional Health Services Report Bates Armor 572-615	195	Exh. 10 - Discharge Summary Bates Terry 316	134	Exh. 11 - LD Flowsheet Bates Terry 308	114	Exh. 12 - Interrogatories	179	<p style="text-align: right;">Page 5</p> <p>1 appears for Armor. 2 WHEREUPON, 3 REBECCA TERRY 4 Called for examination, being first duly 5 sworn, was examined and testified as follows: 6 MR. KNOTT: I should have noted for the 7 record, that also accompanying me is Cory Brewer, an 8 associate of mine, and Randy Arnold, also an 9 associate of mine. 10 E X A M I N A T I O N 11 BY MR. KNOTT: 12 Q Please state your full name for the record. 13 A Rebecca Lynn Terry. 14 Q And where do you currently live? 15 A In South Milwaukee. 16 Q Do you live with anybody there? 17 A Yes. 18 Q Who do you live with? 19 A My boyfriend's sister. 20 Q Okay. Does your boyfriend live there? 21 A Not currently, no. 22 Q What's your boyfriend's sister's name? 23 A Julaine Mercil. 24 Q Could you spell that for the record? 25 A J-u-l-a-i-n-e, M-e-r-c-i-l.</p>
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<p style="text-align: right;">Page 6</p> <p>1 Q Ms. Terry, I presume that you met with your attorneys 2 to talk about what's going to happen today; is that 3 true? 4 A That is true. 5 Q So you're aware that I'm going to ask you questions 6 and that you're under oath and you need to tell the 7 truth; right? 8 A Yes, I understand that. 9 Q You understand that. And I presume you know that we 10 can't speak over one another because it makes it more 11 difficult for the court reporter to record what we're 12 doing; okay? 13 A I understand. 14 Q I will try to let you finish your answer before I ask 15 the next question; and if you could please wait for 16 me to finish the question before you answer, that 17 would be best. 18 Our responses need to be out loud. 19 Sometimes if you shake your head, I will ask you to 20 confirm what you're saying, but I'm trying to get you 21 to say a word on the record. I'm not trying to get 22 you to change your answer. 23 Do you understand that? 24 A I do understand. 25 Q And finally, if you have any questions about what I'm</p>	<p style="text-align: right;">Page 8</p> <p>1 A He recently moved. He works through Wheaton 2 Franciscan in Union Grove. 3 Q Do you see him in Union Grove? 4 A I do. 5 Q And how long have you seen Dr. Timothy Allen? 6 A Approximately a couple of years. 7 Q Have you used any street drugs today? 8 A No. 9 Q Have you used any alcohol today? 10 A I have not. 11 Q When was the last time you used street drugs? 12 MS. KLEINHAUS: Object. I'm going to 13 direct her not to answer that. I don't think any use 14 of street drugs is relevant to this case. 15 MR. KNOTT: Well, relevance is not a proper 16 objection. We're off to a bad start here, Tess, if 17 you're going to object on the grounds of relevance. 18 MS. KLEINHAUS: Okay. I'm going to tell 19 you that I believe the question is harassing, and we 20 will move for a protective order under Rule 26(c). 21 I'm directing her not to answer that. 22 MR. RUSSART: Can we have the witness 23 excused from the room so we can have a discussion, 24 please. 25 MS. KLEINHAUS: Sure.</p>
<p style="text-align: right;">Page 7</p> <p>1 asking, if you don't understand my question, would 2 you please speak up and ask me to clarify? 3 A I will do so. 4 Q If you go ahead and answer the question, I'm going to 5 presume, and anyone who reads the transcript is going 6 to presume, that you understood the question; fair? 7 A That is fair. 8 Q Are you taking any medications that would affect your 9 ability to answer questions today? 10 A No, I'm not. 11 Q Do you currently take any prescribed medications 12 whatsoever? 13 A I do. 14 Q What medications do you take? 15 A I take Suboxone, I take Lithium, I take 16 Amitriptyline, and Prazosin. 17 Q What's the last one? 18 A Prazosin. 19 Q What's that? 20 A It's an adrenaline blocker for nightmares. 21 Q For your nerves? 22 A For nightmares. 23 Q And who prescribes those? 24 A Dr. Timothy Allen. 25 Q And where does Dr. Allen work?</p>	<p style="text-align: right;">Page 9</p> <p>1 MR. KNOTT: Let me -- before we do that, 2 let's hold on a second. Are you claiming damages in 3 this case? Are you claiming -- are you seeking 4 compensation in this case? 5 MS. KLEINHAUS: Of course she is seeking 6 money damages. 7 MR. KNOTT: You can't testify, Tess. 8 MS. KLEINHAUS: It calls for a legal 9 conclusion. 10 MR. KNOTT: We're off to a very poor start. 11 BY MR. KNOTT: 12 Q Do you understand that you're seeking money 13 compensation in this case? 14 A I do understand. 15 Q And that you're claiming that you suffer from anxiety 16 as a result of what happened in March 2014? 17 A I do understand. 18 Q And that you claim that you suffer from depression as 19 a result of that? 20 A Uh-huh, I do understand. 21 Q And that you suffer certain symptoms, such as 22 nervousness, sleeplessness as a result? 23 A Correct. 24 Q Do you understand that the use of heroin, for 25 instance, affects your health in a negative way?</p>

<p style="text-align: right;">Page 10</p> <p>1 A I do understand that.</p> <p>2 MR. KNOTT: Okay. The witness should be</p> <p>3 excused while we discuss whether she is going to</p> <p>4 answer the question of when the last time was she</p> <p>5 used street drugs.</p> <p>6 MS. KLEINHAUS: Just step right outside.</p> <p>7 THE VIDEOGRAPHER: Going off the record?</p> <p>8 MS. KLEINHAUS: No, we will stay on the</p> <p>9 record.</p> <p>10 MR. KNOTT: So Tess, you shorted us on your</p> <p>11 interrogatory responses. You gave us virtually no</p> <p>12 information. I'm here to take her deposition.</p> <p>13 You're claiming damages that are amorphous, and we're</p> <p>14 entitled to know what other stressors she has in her</p> <p>15 life, and that's a very broad category, and we're</p> <p>16 going to talk about it all today.</p> <p>17 MR. RUSSART: You also indicated in an</p> <p>18 email that you're only producing her once, so</p> <p>19 instructing a witness not to answer on the grounds of</p> <p>20 the question is irrelevant does not -- is not a</p> <p>21 proper grounds for an instruction of that nature.</p> <p>22 So we can, I guess, call the court,</p> <p>23 whatever you think you need to do in order to stand</p> <p>24 by your contention that you're only producing her</p> <p>25 once.</p>	<p style="text-align: right;">Page 12</p> <p>1 street drugs and whatever methods and modes she</p> <p>2 applies to get the funds to get those drugs, it</p> <p>3 affects her potentially emotionally, it can affect</p> <p>4 symptoms of PTSD, it could exacerbate PTSD, it could</p> <p>5 cause PTSD depending on what she is doing.</p> <p>6 So since that's the claim that's being</p> <p>7 made, I would strongly disagree that it's irrelevant.</p> <p>8 MR. KNOTT: Every aspect of her life since</p> <p>9 the date that she was allegedly injured is relevant,</p> <p>10 and it doesn't need to be relevant for the purpose of</p> <p>11 the deposition, so -- it was about the fourth or</p> <p>12 fifth question, and you're going to instruct her</p> <p>13 not to -- it was the first time I asked about the use</p> <p>14 of illegal drugs, and you're going to instruct her</p> <p>15 not to answer on the basis that that question is</p> <p>16 harassing?</p> <p>17 MS. KLEINHAUS: I instructed her not to</p> <p>18 answer, and we're going to seek a protective order on</p> <p>19 that basis. If you want to talk to her about the</p> <p>20 symptoms and experiences that she has had as a result</p> <p>21 of what happened at Milwaukee County Jail, obviously</p> <p>22 you're entitled to do that as part of your damages</p> <p>23 case, and clearly we disagree what's relevant to her</p> <p>24 damages, and we will have to have a court, I guess,</p> <p>25 decide that if we haven't come to an agreement.</p>
<p style="text-align: right;">Page 11</p> <p>1 MS. KLEINHAUS: So I'm directing her not to</p> <p>2 answer under Rule 26(c). We will move to get a</p> <p>3 protective order from the court. If the court rules</p> <p>4 that you're allowed to ask about street drug use</p> <p>5 since this incident, then obviously she will have to</p> <p>6 be produced to answer those questions and we will</p> <p>7 abide by the ruling of the court.</p> <p>8 MR. RUSSART: Why didn't you move for a</p> <p>9 protective order before today?</p> <p>10 MS. KLEINHAUS: There is no requirement</p> <p>11 that I move in advance. I didn't know what he's</p> <p>12 going to ask, but I'm -- that's the procedure under</p> <p>13 Rule 26, so that's what I'm going to follow.</p> <p>14 MR. KNOTT: So your position is that the</p> <p>15 question is not -- seeks information that's not</p> <p>16 relevant or would lead to the discovery of relevant</p> <p>17 information?</p> <p>18 MS. KLEINHAUS: No, my position is that</p> <p>19 it's harassing, and one of the reasons that it's</p> <p>20 harassing is that it's not relevant to the claims in</p> <p>21 this case.</p> <p>22 MR. RUSSART: That's your position, but</p> <p>23 obviously Doug laid the groundwork here for the fact</p> <p>24 that it is relevant to the claims of damages that she</p> <p>25 is making. I mean, if she is continuing to use</p>	<p style="text-align: right;">Page 13</p> <p>1 MR. KNOTT: We're not going to come to an</p> <p>2 agreement. Are you terminating the deposition?</p> <p>3 MS. KLEINHAUS: No, I'm instructing her not</p> <p>4 to answer that question.</p> <p>5 MR. KNOTT: I think your obligation is to</p> <p>6 terminate the deposition and seek a protective order.</p> <p>7 MS. KLEINHAUS: No, I disagree that that's</p> <p>8 my obligation. She is prepared to answer your</p> <p>9 questions today. She is eager to get it done, so</p> <p>10 let's get it done. And to the extent that there are</p> <p>11 questions that I direct her not to answer, we will</p> <p>12 seek a protective order and we can litigate it and</p> <p>13 you can take your position.</p> <p>14 MR. KNOTT: So I can't ask the questions in</p> <p>15 the order that I would like to ask them. You get to</p> <p>16 instruct her not to answer questions because you</p> <p>17 don't think it's relevant. I don't think it's the</p> <p>18 right way to proceed.</p> <p>19 MS. KLEINHAUS: You can ask them in any</p> <p>20 order that you choose. There may -- as in any</p> <p>21 deposition, there may be questions that I direct her</p> <p>22 not to answer.</p> <p>23 MR. RUSSART: Well, there is medical</p> <p>24 records that exist after her -- after giving birth at</p> <p>25 the jail in which it indicates that she was using</p>

<p style="text-align: right;">Page 14</p> <p>1 illicit drugs. Are you going to say that we can't 2 ask about those medical records or about those 3 reports of her use of illegal drugs? Because you 4 said earlier, anything after the birth we can't ask 5 her that.</p> <p>6 MS. KLEINHAUS: We probably need to take it 7 question by question.</p> <p>8 MR. RUSSART: I think I agree with Doug. 9 Maybe it's not your obligation. If Doug wants to 10 proceed in a certain fashion, it's his obligation to 11 terminate the deposition and seek costs.</p> <p>12 MR. KNOTT: Yeah, I think we need to see if 13 the court is available, because this is going to -- 14 the deposition will not serve a purpose if we are not 15 able to ask about her damages.</p> <p>16 MS. KLEINHAUS: Okay.</p> <p>17 THE VIDEOGRAPHER: Going off the record at 18 12:22 p.m. 19 (Off the record.) 20 THE VIDEOGRAPHER: We're back on the record 21 at 12:38 p.m. 22 MR. KNOTT: Well, I attempted to reach the 23 court to resolve the issue of the instruction not to 24 answer one of the first questions in the deposition, 25 and the judge is no longer available for the day, is</p>	<p style="text-align: right;">Page 16</p> <p>1 those questions. I'm not willing to agree to an 2 extension of the dispositive motion schedule. In 3 depositions, it's common for there to be -- perhaps 4 not common, but it happens that there are questions 5 that witness are told not to answer, and the parties 6 have to sort that out, so we're not terminating the 7 deposition. We object to it being terminated. We 8 want to continue and have her answer everything that 9 she can answer.</p> <p>10 MR. KNOTT: Can you tell me what questions 11 she will answer about her health, counseling, and 12 stressors, other than the injury allegedly related to 13 this -- to this incident?</p> <p>14 THE WITNESS: I can tell you broadly. I'm 15 not -- I'm going to direct her not to answer 16 questions about use of street drugs since this 17 incident, because it's not relevant to her damages.</p> <p>18 MR. KNOTT: I'm sorry, just -- you're going 19 to direct her to not answer questions related to 20 street drugs what in this incident?</p> <p>21 MS. KLEINHAUS: Since this incident, so 22 postdating this incident. If you want to talk to her 23 about other stressors in her life, whatever that 24 might entail, at this time I don't see a reason why I 25 would direct her not to answer those. So obviously,</p>
<p style="text-align: right;">Page 15</p> <p>1 in meetings this afternoon, and so we are not able to 2 resolve it in that fashion.</p> <p>3 I'm under a great deal of time pressure 4 with a summary judgment deadline of June 11. This 5 hampers me a great deal.</p> <p>6 I'm asking for your stipulation to a motion 7 to extend the deadline for summary judgment in 8 exchange for we continue this deposition without the 9 court's involvement at this time, which I think is 10 improper. I think you're waiving your right to bring 11 a protective order on these questions by not halting 12 the deposition and seeking a protective order now.</p> <p>13 MS. KLEINHAUS: My understanding is that 14 the proper procedure is to take it question by 15 question to determine whether or not she can answer 16 and direct her based on that question.</p> <p>17 As I said before this break, we're under no 18 obligation to terminate the deposition because we 19 have directed her not to answer on one question. 20 We're not going to terminate it on that basis and 21 we're not under an obligation to do so.</p> <p>22 We are obligated to advise her question by 23 question, that's what I will do, and tell her not to 24 answer the things that I think she is not required to 25 answer, and we will seek a protective order as to</p>	<p style="text-align: right;">Page 17</p> <p>1 you know, you can ask them. As I said, I tend to 2 take it question by question as we always do in 3 deposition.</p> <p>4 MR. RUSSART: So my concern here is if she 5 would answer the question about when she last used 6 street drugs, you know, we would then proceed to ask 7 her questions about how she obtained those drugs, 8 what the cost was, how frequently she was using it, 9 whether cost was over the course of a week or over 10 the course of a month, where did she get that money 11 to do that, did she encounter any trauma or 12 situations that caused her injury during the period 13 of time that she was doing whatever she needed to do 14 to get the money for the drugs. All of those things 15 that would go to an assessment of whatever anxiety or 16 PTSD she has as related to the incident and the jail 17 versus what's been ongoing in her life, you're saying 18 she is not going to answer any of those types of 19 questions?</p> <p>20 MS. KLEINHAUS: Correct.</p> <p>21 MR. RUSSART: Okay. Because you believe 22 those are harassing, that's -- as opposed to seeking 23 relevant information relative to the extent of her 24 life causing her condition versus this incident 25 causing the condition.</p>

<p style="text-align: right;">Page 18</p> <p>1 MS. KLEINHAUS: I think you understand my 2 position. 3 MR. RUSSART: Okay. 4 MR. KNOTT: And just for the record, we 5 asked for records of treatment for her counseling, 6 and you refused to provide authorizations for that 7 whether before or after. 8 MS. KLEINHAUS: I disagree with that, Doug. 9 We provided medical authorizations. We came to an 10 agreement with you about the time frame, and we 11 provided that, and we provided answers to 12 interrogatories. So if you wanted those records, you 13 were in a position to seek them. 14 MR. KNOTT: Please don't interrupt me. 15 And we are about three questions into this 16 deposition when the witness revealed the use of 17 medications and -- that we -- and a provider that we 18 have never been informed of. You feel no obligation 19 to tell us about her treatment? 20 MS. KLEINHAUS: No, that's wrong. That 21 information has been provided to you in written 22 discovery, but now I think we're getting away from 23 the central issue that we're trying to resolve right 24 now, which is can you proceed with the deposition and 25 go question by question. That's what we would like</p>	<p style="text-align: right;">Page 20</p> <p>1 admissibility of that testimony. 2 I have an approaching deadline for summary 3 judgment, and you have -- you will not stipulate to 4 any -- to even agreeing that we can have this issue 5 resolved before that deadline. 6 You put me in a position of -- of 7 potentially waiving my ability to prepare and submit 8 summary judgment as it should be submitted. I have 9 no choice in my mind without knowing how the court 10 would rule, but to go forward of course, if you 11 are -- if we are required to come back and complete 12 this deposition, we will seek full costs, I think. 13 MR. RUSSART: I just -- I think it's 14 reasonable for us to take the position here that the 15 deposition will have to be completed after this issue 16 is determined so that we can fully cross-examine your 17 witness on damages, so I don't intend to go into any 18 questions on damages today on the basis that I don't 19 want my deposition interrupted by your instructions 20 not to answer. 21 MS. KLEINHAUS: That's your choice, but 22 I -- I'm only directing her not to answer related to 23 one -- you know, a question related to one subject 24 area. You want to waive asking about damages in 25 totality, that's your --</p>
<p style="text-align: right;">Page 19</p> <p>1 to do. 2 MR. KNOTT: Well -- 3 MR. RUSSART: I have another question 4 before we go ahead, and I wanted to make sure that 5 the record is clear. You made no attempt before this 6 deposition to inform us that there would be no 7 testimony allowed relative to her post-incident 8 illicit drug use. That's correct; right? 9 MS. KLEINHAUS: I'm not the deponent here 10 who has to answer questions. 11 MR. RUSSART: I'm trying to make a record. 12 MR. KNOTT: You have interrupted the 13 examination. 14 MR. RUSSART: Don't you want to make a 15 record, Tess? 16 MS. KLEINHAUS: I'm under no obligation to 17 tell you in advance of the deposition what my 18 objections will be at the deposition. And given that 19 I'm not under that obligation, no, I did not write 20 you to tell you about my deposition preparation. 21 MR. RUSSART: Perfect. 22 MR. KNOTT: Well, I do think it's your 23 obligation to seek a protective order, otherwise the 24 witness is obligated to answer subject to the court's 25 determination, on the basis of the transcript, as to</p>	<p style="text-align: right;">Page 21</p> <p>1 MR. RUSSART: Well -- 2 MS. KLEINHAUS: Let me finish. 3 MR. RUSSART: I'm going to. 4 MS. KLEINHAUS: That's your option, but the 5 matter that's to be litigated with the court is this 6 issue of questions about street drugs after this 7 incident. So, you know, the court's order will be 8 related to answering those questions, not damages 9 generally. 10 MR. RUSSART: I think you're wrong, 11 because -- 12 MS. KLEINHAUS: Okay. Doug, if you want to 13 not ask her about damages, that's fine. 14 MR. RUSSART: I am going to make a record, 15 and you asked me not to interrupt you, I would prefer 16 the same courtesy. Can you do that? 17 MS. KLEINHAUS: Proceed. 18 MR. RUSSART: The situation is, though, for 19 example, if we ask questions about whether she has 20 custody of Leland now and when she got it and when 21 she was prevented from getting it, it's most likely 22 going to lead to questions and answers about her 23 addiction and whether she was sober at the time and 24 whether she wasn't. 25 And so I don't see how we can unwind all of</p>

<p style="text-align: right;">Page 22</p> <p>1 that when you're not going to let her answer any</p> <p>2 questions about her illicit drug use, so I think this</p> <p>3 poses quite a conundrum.</p> <p>4 MS. KLEINHAUS: Okay. So shall I bring the</p> <p>5 witness back in?</p> <p>6 MR. KNOTT: Let's take a minute to</p> <p>7 determine how we're going to go forward.</p> <p>8 MR. RUSSART: One last question. Just so</p> <p>9 it's clear, you are not agreeing to allow the</p> <p>10 deposition to go forward on just the deliberate</p> <p>11 indifference claims and not damages and then</p> <p>12 reconvene on damages. You're saying that you will</p> <p>13 not agree to that, or would you agree to that?</p> <p>14 MS. KLEINHAUS: No, I would not agree to</p> <p>15 that.</p> <p>16 MR. RUSSART: Okay.</p> <p>17 MS. KLEINHAUS: I haven't directed her not</p> <p>18 to answer on damages. I haven't directed her not to</p> <p>19 answer about her kids. I have directed her not to</p> <p>20 answer about street drugs, and that's our position, I</p> <p>21 think it's clear, and why don't you all take your</p> <p>22 break and decide what you want to do.</p> <p>23 THE VIDEOGRAPHER: Going off the record at</p> <p>24 12:49 p.m.</p> <p>25 (Off the record.)</p>	<p style="text-align: right;">Page 24</p> <p>1 A Correct.</p> <p>2 Q Do you consider yourself an addict today?</p> <p>3 A I consider myself a recovering addict today.</p> <p>4 Q Are you currently receiving any counseling?</p> <p>5 A I'm sorry?</p> <p>6 Q Are you currently receiving any counseling?</p> <p>7 A No. Not formal counseling, no.</p> <p>8 Q And any informal counseling?</p> <p>9 A Yes, as far as NA meetings and things like that, and</p> <p>10 then through my doctor.</p> <p>11 Q What meetings?</p> <p>12 A Like NA meetings.</p> <p>13 Q What's that?</p> <p>14 A Narcotics Anonymous.</p> <p>15 Q And your doctor is Dr. Allen?</p> <p>16 A Yes, sir.</p> <p>17 Q And do you have a mental health diagnosis?</p> <p>18 A I do.</p> <p>19 Q What is that?</p> <p>20 A Bipolar disorder and PTSD.</p> <p>21 Q And who diagnosed you with PTSD?</p> <p>22 A Dr. Timothy Allen.</p> <p>23 Q And when was that?</p> <p>24 A I'm not sure.</p> <p>25 Q Do you claim that that mental health diagnosis is the</p>
<p style="text-align: right;">Page 23</p> <p>1 THE VIDEOGRAPHER: Back on the record at</p> <p>2 12:58 p.m.</p> <p>3 MR. KNOTT: Given the deadlines that we</p> <p>4 discussed, I see no choice but to proceed. I'm not</p> <p>5 waiving my right to have full and complete answers</p> <p>6 and to complete the deposition when this issue is</p> <p>7 resolved.</p> <p>8 BY MR. KNOTT:</p> <p>9 Q Ms. Terry, you're going to follow the advice of your</p> <p>10 counsel and not answer the pending question?</p> <p>11 A Okay.</p> <p>12 Q Is that true?</p> <p>13 A Oh, I'm sorry, I didn't realize you were asking, I</p> <p>14 thought you were telling me. I am going to follow my</p> <p>15 counsel's advice.</p> <p>16 Q You have in the past used street drugs?</p> <p>17 A That is correct.</p> <p>18 Q And you have in the past, since the time of the</p> <p>19 incident involved in this litigation, used street</p> <p>20 drugs?</p> <p>21 MS. KLEINHAUS: I'm going to object and</p> <p>22 direct her not to answer that question.</p> <p>23 BY MR. KNOTT:</p> <p>24 Q And you, in fact, were a heroin addict for a period</p> <p>25 of time; correct?</p>	<p style="text-align: right;">Page 25</p> <p>1 result of some conduct of the defendants in this</p> <p>2 case?</p> <p>3 MS. KLEINHAUS: Object to the extent it</p> <p>4 calls for a legal conclusion. You can answer.</p> <p>5 THE WITNESS: The way that I would answer</p> <p>6 that is I didn't have these issues before the</p> <p>7 incident that we're talking about, so I do believe</p> <p>8 that that played a part in it.</p> <p>9 BY MR. KNOTT:</p> <p>10 Q Did you have a diagnosis of posttraumatic stress</p> <p>11 disorder before March of 2014?</p> <p>12 A No.</p> <p>13 Q Do you claim that that condition is a result of the</p> <p>14 events in this litigation?</p> <p>15 A I do.</p> <p>16 Q And has that impaired your ability to function?</p> <p>17 A It has.</p> <p>18 Q Are you claiming in this litigation that you suffered</p> <p>19 anxiety as a result of the events, March 2014?</p> <p>20 A Correct.</p> <p>21 Q And have you since March of 2014 sought treatment for</p> <p>22 anxiety?</p> <p>23 A I have.</p> <p>24 Q Are the medications you're taking today for treatment</p> <p>25 of anxiety?</p>

<p style="text-align: right;">Page 26</p> <p>1 A Not directly, no.</p> <p>2 Q What are they for treatment of?</p> <p>3 A Suboxone is treatment for opiate dependency.</p> <p>4 Amitriptyline is like a sleep medicine. It helps</p> <p>5 with the sleeplessness. The Prazosin is for the</p> <p>6 nightmares and night terrors, and then the Lithium is</p> <p>7 for bipolar.</p> <p>8 Q You were a heroin addict, per my review of the</p> <p>9 records, for at least six years?</p> <p>10 A Correct.</p> <p>11 Q How long were you a heroin addict?</p> <p>12 MS. KLEINHAUS: Object to the form of the</p> <p>13 question. You can answer.</p> <p>14 THE WITNESS: I'm not sure I understand.</p> <p>15 That seemed like the same question.</p> <p>16 BY MR. KNOTT:</p> <p>17 Q How long were you using heroin?</p> <p>18 MS. KLEINHAUS: Object to the form of the</p> <p>19 question. I'm going to direct her not to answer.</p> <p>20 BY MR. KNOTT:</p> <p>21 Q When did you start using heroin?</p> <p>22 A I believe I was around 26 years old.</p> <p>23 Q How old are you today?</p> <p>24 A 36.</p> <p>25 Q Do you agree with me that the use of heroin can alter</p>	<p style="text-align: right;">Page 28</p> <p>1 MS. KLEINHAUS: I'm directing -- no, go</p> <p>2 ahead, finish your answer.</p> <p>3 THE WITNESS: Because I thought I answered</p> <p>4 that question already twice.</p> <p>5 BY MR. KNOTT:</p> <p>6 Q Have you used marijuana today?</p> <p>7 A No, I haven't.</p> <p>8 Q Have you used marijuana since March of 2014?</p> <p>9 MS. KLEINHAUS: I'm going to direct her not</p> <p>10 to answer that.</p> <p>11 BY MR. KNOTT:</p> <p>12 Q Were you arrested when you suffered a relapse most</p> <p>13 recently?</p> <p>14 A No, I was not.</p> <p>15 Q Did you seek treatment and get treatment as a result</p> <p>16 of that relapse?</p> <p>17 MS. KLEINHAUS: I will just object and</p> <p>18 direct her not to answer.</p> <p>19 BY MR. KNOTT:</p> <p>20 Q Did you relapse as a result of stress in your life?</p> <p>21 MS. KLEINHAUS: Just object and direct her</p> <p>22 not to answer.</p> <p>23 BY MR. KNOTT:</p> <p>24 Q Is it troubling to you as a person when you're using</p> <p>25 heroin and unable to stop?</p>
<p style="text-align: right;">Page 27</p> <p>1 your perception of reality?</p> <p>2 A I do.</p> <p>3 Q Do you agree with me that it can alter your memory?</p> <p>4 A I do.</p> <p>5 Q Have you ever suffered blackouts as a result of use</p> <p>6 of street drugs?</p> <p>7 A Only once that I can remember.</p> <p>8 Q And when was that?</p> <p>9 A That was through an overdose. That was a relapse</p> <p>10 that I had not too far in the past. I'm not sure the</p> <p>11 exact date.</p> <p>12 Q When did you suffer a relapse and what drugs did you</p> <p>13 use?</p> <p>14 MS. KLEINHAUS: Object to the extent it</p> <p>15 requests information about illicit street drugs since</p> <p>16 the time of this incident. I will direct her not to</p> <p>17 answer.</p> <p>18 MR. KNOTT: So I think she has answered the</p> <p>19 question that she had a relapse since the time of</p> <p>20 these events. We're entitled to explore that.</p> <p>21 MS. KLEINHAUS: I'm directing her not to</p> <p>22 answer it.</p> <p>23 BY MR. KNOTT:</p> <p>24 Q Ms. Terry, have you used heroin today?</p> <p>25 A I have not.</p>	<p style="text-align: right;">Page 29</p> <p>1 MS. KLEINHAUS: Just object to the form of</p> <p>2 the question. There is no time frame, it's phrased</p> <p>3 in the present tense, so I'm going to direct her not</p> <p>4 to answer.</p> <p>5 BY MR. KNOTT:</p> <p>6 Q Ms. Terry, you have an experience in your lifetime</p> <p>7 with the use of heroin. Is it fair to say that those</p> <p>8 times have been low points in your life?</p> <p>9 A Yes.</p> <p>10 Q And it has caused you to live your life in a way that</p> <p>11 is not your preference; fair?</p> <p>12 A Fair.</p> <p>13 Q And --</p> <p>14 MS. KLEINHAUS: That's fine, that's okay.</p> <p>15 BY MR. KNOTT:</p> <p>16 Q At some point since March of 2014, you have told us</p> <p>17 you relapsed and were using heroin --</p> <p>18 MS. KLEINHAUS: I'm going to direct her --</p> <p>19 MR. KNOTT: -- correct?</p> <p>20 MS. KLEINHAUS: Sorry. Are you through?</p> <p>21 MR. KNOTT: Yeah.</p> <p>22 MS. KLEINHAUS: I'm going to direct her not</p> <p>23 to answer.</p> <p>24 BY MR. KNOTT:</p> <p>25 Q If you had relapsed since March 2014, would that have</p>

<p style="text-align: right;">Page 30</p> <p>1 been another low point in your life?</p> <p>2 MS. KLEINHAUS: I'm going to direct her not</p> <p>3 to answer.</p> <p>4 BY MR. KNOTT:</p> <p>5 Q Any time you relapse, do you agree with me that it</p> <p>6 is -- causes stress?</p> <p>7 MS. KLEINHAUS: I'm going to direct her not</p> <p>8 to answer to the extent there is no time frame in the</p> <p>9 question.</p> <p>10 MR. KNOTT: I'm -- this is ridiculous. I</p> <p>11 can't ask her about her emotional state in general</p> <p>12 because you're going to direct her not to answer.</p> <p>13 MS. KLEINHAUS: I need to make clear our</p> <p>14 position is her emotional state as a result of what</p> <p>15 happened in the jail we believe is relevant. If you</p> <p>16 want to talk to her about drug use during that</p> <p>17 pregnancy, you know, I'm not going to direct her not</p> <p>18 to answer that. So as I said, we will take it</p> <p>19 question by question.</p> <p>20 BY MR. KNOTT:</p> <p>21 Q Ms. Terry, you're claiming in this lawsuit that you</p> <p>22 have suffered nightmares as a result of the conduct</p> <p>23 of the defendants?</p> <p>24 A Correct.</p> <p>25 Q Did -- in general, does your use of heroin in the</p>	<p style="text-align: right;">Page 32</p> <p>1 MS. KLEINHAUS: I'm going to go ahead and</p> <p>2 direct her not to answer that either.</p> <p>3 BY MR. KNOTT:</p> <p>4 Q Are you claiming that your post March 2014 relapse</p> <p>5 was a result of stress that you suffered in</p> <p>6 March 2014?</p> <p>7 MS. KLEINHAUS: You can answer that.</p> <p>8 THE WITNESS: Let me clarify what you're</p> <p>9 asking. You're saying that the relapse I was</p> <p>10 speaking about before, was that a direct result of</p> <p>11 what happened --</p> <p>12 BY MR. KNOTT:</p> <p>13 Q Are you claiming that it was a result at all of the</p> <p>14 conduct of these defendants?</p> <p>15 A In part, yes.</p> <p>16 Q In what part?</p> <p>17 A In part any kind of relapse that I have had would --</p> <p>18 after I quit using drugs was mainly to numb feelings</p> <p>19 that I had brought on by not using drugs and feelings</p> <p>20 that I had surrounding that event are -- are the</p> <p>21 strongest feelings that I would have had to numb out</p> <p>22 or that I tried to numb out.</p> <p>23 Q I'm sorry, what was --</p> <p>24 A Or symptoms or whatever?</p> <p>25 Q I'm sorry, what was the end of that, that you tried</p>
<p style="text-align: right;">Page 31</p> <p>1 past impact your ability to sleep?</p> <p>2 A I -- I'm not sure.</p> <p>3 MS. KLEINHAUS: Object to the form of the</p> <p>4 question. You can answer it, if you understand it.</p> <p>5 THE WITNESS: I guess the way I would</p> <p>6 answer that would be not the use of heroin, but not</p> <p>7 using heroin once I have been using heroin at that</p> <p>8 time. So if I was going through withdrawals, it</p> <p>9 would cause sleeplessness at that time when I was a</p> <p>10 daily user.</p> <p>11 BY MR. KNOTT:</p> <p>12 Q And have you gone through withdrawals since March of</p> <p>13 2014?</p> <p>14 MS. KLEINHAUS: Go ahead and answer that.</p> <p>15 THE WITNESS: Yes.</p> <p>16 BY MR. KNOTT:</p> <p>17 Q And when did that occur?</p> <p>18 MS. KLEINHAUS: I'm going to direct you not</p> <p>19 to answer that.</p> <p>20 BY MR. KNOTT:</p> <p>21 Q How long did the withdrawals persist?</p> <p>22 MS. KLEINHAUS: I'm going to direct her not</p> <p>23 to answer that.</p> <p>24 BY MR. KNOTT:</p> <p>25 Q Did it impact your ability to sleep?</p>	<p style="text-align: right;">Page 33</p> <p>1 to --</p> <p>2 A To numb out, to not -- so not having the dreams, not</p> <p>3 having the nightmares, not having the flashbacks or</p> <p>4 the debilitating anxiety attacks, those type of</p> <p>5 things.</p> <p>6 Q So your testimony is that since March 2014, you used</p> <p>7 heroin in order to numb the effects of the emotional</p> <p>8 injuries you suffered in -- as a result of these</p> <p>9 defendants?</p> <p>10 A Correct, until I actually got on medication to deal</p> <p>11 with it.</p> <p>12 Q And who prescribed that medication?</p> <p>13 A Dr. Timothy Allen.</p> <p>14 Q And how much heroin were you using per day as a</p> <p>15 result of the conduct of these defendants?</p> <p>16 MS. KLEINHAUS: Object to the form of the</p> <p>17 question, and I will direct her not to answer.</p> <p>18 If I can clarify, as a legal matter, she is</p> <p>19 not seeking damages for the relapse in this lawsuit.</p> <p>20 Obviously subjectively her experience that she</p> <p>21 experiences them is related. You have that</p> <p>22 testimony. We're not seeking damages from your</p> <p>23 clients because she experienced a relapse.</p> <p>24 MR. RUSSART: Can you just use legal</p> <p>25 objections, please, Ms. Kleinhaus?</p>

<p style="text-align: right;">Page 34</p> <p>1 MR. KNOTT: And, you know, pardon me, but I</p> <p>2 think it's going to be a little hard for the jury to</p> <p>3 sort out the cause of the damages you're claiming if</p> <p>4 we can't explore it and if we are not allowed to</p> <p>5 trace the source of her alleged distress.</p> <p>6 BY MR. KNOTT:</p> <p>7 Q Ms. Terry, did your use of illegal street drugs post</p> <p>8 March 2014 cause you to experience distress?</p> <p>9 A I'm sorry, can you repeat that?</p> <p>10 Q Did it cause you to feel -- to experience distress?</p> <p>11 MS. KLEINHAUS: Object to the form of the</p> <p>12 question. You can answer.</p> <p>13 THE WITNESS: Did my use of street drugs --</p> <p>14 I'm sorry, can you repeat the last part one more</p> <p>15 time? I'm not sure I understood at first.</p> <p>16 BY MR. KNOTT:</p> <p>17 Q In your lifetime, when you are addicted to heroin,</p> <p>18 does it cause you emotional distress?</p> <p>19 A Yes.</p> <p>20 Q Does it impact your relationship with others?</p> <p>21 A Yes.</p> <p>22 Q Does it impact your ability to be a mother?</p> <p>23 A Yes.</p> <p>24 Q Did your use of illegal street drugs after March of</p> <p>25 2014 interfere with your relationship with others?</p>	<p style="text-align: right;">Page 36</p> <p>1 MS. KLEINHAUS: Object to the form. Asked</p> <p>2 and answered.</p> <p>3 THE WITNESS: Are you asking in March did I</p> <p>4 go or --</p> <p>5 BY MR. KNOTT:</p> <p>6 Q Yeah.</p> <p>7 A -- after that incident?</p> <p>8 Q After.</p> <p>9 A Yes.</p> <p>10 Q Where did you go?</p> <p>11 A I sought treatment at a few different places: UCC,</p> <p>12 META House.</p> <p>13 Q What is UCC?</p> <p>14 A United Community Center.</p> <p>15 Q Where is that located?</p> <p>16 A I'm not exactly sure. It's on the south side of</p> <p>17 Milwaukee.</p> <p>18 Q When did you go to UCC?</p> <p>19 MS. KLEINHAUS: I'm going to direct her not</p> <p>20 to answer that.</p> <p>21 BY MR. KNOTT:</p> <p>22 Q When did you go to seek treatment for -- at Beta</p> <p>23 house?</p> <p>24 A META House.</p> <p>25 MS. KLEINHAUS: I'm going to instruct her</p>
<p style="text-align: right;">Page 35</p> <p>1 MS. KLEINHAUS: Object to the form of the</p> <p>2 question, asked and answered. You can answer again.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. KNOTT:</p> <p>5 Q Tell me what you're claiming occurred in terms of</p> <p>6 your relationship with others.</p> <p>7 MS. KLEINHAUS: Just object to the form of</p> <p>8 the question. She hasn't claimed anything occurred</p> <p>9 with her relationship with others.</p> <p>10 MR. KNOTT: I think she just did.</p> <p>11 MS. KLEINHAUS: Go ahead and answer if you</p> <p>12 understand.</p> <p>13 THE WITNESS: May I ask if this is what</p> <p>14 you're asking me? You're saying as a result of my</p> <p>15 drug use since the incident in March of 2014, what</p> <p>16 was the impact of -- with my relationship with</p> <p>17 others? Is that how I'm understanding it?</p> <p>18 BY MR. KNOTT:</p> <p>19 Q That's right.</p> <p>20 A I -- I would isolate from people. I didn't want to</p> <p>21 be around people. That was the biggest part of it,</p> <p>22 or people being concerned about me and struggling to</p> <p>23 maintain relationships.</p> <p>24 Q Did you go to a treatment center after your release</p> <p>25 from jail in March of 2014?</p>	<p style="text-align: right;">Page 37</p> <p>1 not to answer.</p> <p>2 BY MR. KNOTT:</p> <p>3 Q I'm sorry, what's the name of the house?</p> <p>4 A META House, M-E-T-A.</p> <p>5 Q And where is that located?</p> <p>6 A Again, I'm not sure. It's like the east side of</p> <p>7 Milwaukee. And then may I finish answering the</p> <p>8 question about where else I sought treatment?</p> <p>9 Q Of course.</p> <p>10 A Like the -- my doctor that I spoke about before, Dr.</p> <p>11 Allen, I went to him specifically seeking help with</p> <p>12 addiction through medication, and then he helped me</p> <p>13 with the other stuff as well.</p> <p>14 Q And you went to META House after your discharge from</p> <p>15 the Milwaukee County Jail in March 2014; true?</p> <p>16 MS. KLEINHAUS: Objection; asked and</p> <p>17 answered. You can answer again.</p> <p>18 THE WITNESS: I did go after I was</p> <p>19 discharged from jail at some point, yes.</p> <p>20 BY MR. KNOTT:</p> <p>21 Q And when?</p> <p>22 A I'm not sure when exactly it was. Some time since</p> <p>23 then. That was a few years ago. I went there</p> <p>24 seeking help.</p> <p>25 Q And do you know how much your treatment at META House</p>

<p style="text-align: right;">Page 38</p> <p>1 cost?</p> <p>2 A I would not have known that.</p> <p>3 Q Did you pay out of pocket for treatment at UCC?</p> <p>4 A I did not.</p> <p>5 Q Who paid for that treatment?</p> <p>6 A I don't know if UCC was county-funded or through my</p> <p>7 state insurance.</p> <p>8 Q Who paid for META House?</p> <p>9 A Again, the same answer applies.</p> <p>10 Q And who pays for your treatment with Dr. Allen?</p> <p>11 A I have state insurance that pays for it.</p> <p>12 Q State insurance?</p> <p>13 A Yes.</p> <p>14 Q Do you contribute to your state insurance?</p> <p>15 A I do not.</p> <p>16 Q Have you used cocaine today?</p> <p>17 A I have not.</p> <p>18 Q Have you used cocaine since March 2014?</p> <p>19 MS. KLEINHAUS: I'm going to direct her not</p> <p>20 to answer that.</p> <p>21 BY MR. KNOTT:</p> <p>22 Q Have you used crack cocaine in the past?</p> <p>23 MS. KLEINHAUS: Object to the form of the</p> <p>24 question. I'm going to direct her not to answer</p> <p>25 that.</p>	<p style="text-align: right;">Page 40</p> <p>1 to answer.</p> <p>2 BY MR. KNOTT:</p> <p>3 Q Were you using crack cocaine on March 9, 2014?</p> <p>4 A I believe I was.</p> <p>5 Q And when had you last used crack before you were</p> <p>6 arrested?</p> <p>7 A When you say when I was arrested, did you mean on</p> <p>8 March 19th, 2014?</p> <p>9 Q March 9.</p> <p>10 A Thank you. Sometime within that day. I'm not</p> <p>11 sure -- it was probably earlier in the day, but I</p> <p>12 don't know an exact time.</p> <p>13 Q And how -- when had you last used heroin before you</p> <p>14 were arrested?</p> <p>15 A Again, it was earlier that day.</p> <p>16 Q Can you tell me any more specifically?</p> <p>17 A I don't know an exact time. It was daylight.</p> <p>18 Q Other than bipolar disorder and PTSD, do you have any</p> <p>19 other medical or mental health diagnoses?</p> <p>20 A No, Dr. Allen and I are working through one by one.</p> <p>21 Q Have you ever -- is Dr. Allen a psychiatrist?</p> <p>22 A He's an addiction specialist, a psychiatrist, and</p> <p>23 family medicine.</p> <p>24 Q Before Dr. Allen, had you ever made an appointment</p> <p>25 and seen a psychiatrist, psychologist, or addiction</p>
<p style="text-align: right;">Page 39</p> <p>1 BY MR. KNOTT:</p> <p>2 Q Do you agree with me that the use of crack cocaine,</p> <p>3 in your experience, has an impact on your ability to</p> <p>4 remember?</p> <p>5 MS. KLEINHAUS: I'm going to object to the</p> <p>6 form of the question. Assumes facts that haven't</p> <p>7 been established. I'm going to direct her not to</p> <p>8 answer.</p> <p>9 MR. KNOTT: I'm sorry, what? Object to the</p> <p>10 form of the question, what?</p> <p>11 MS. KLEINHAUS: I objected to the form of</p> <p>12 the question and I directed her not to answer.</p> <p>13 MR. RUSSART: "Assumes facts not in</p> <p>14 evidence" she said.</p> <p>15 MR. KNOTT: Oh, thank you.</p> <p>16 MR. RUSSART: I think she is referring to</p> <p>17 the fact that you used the modifier "crack."</p> <p>18 BY MR. KNOTT:</p> <p>19 Q Ms. Terry, have you in the past used crack cocaine?</p> <p>20 MS. KLEINHAUS: I'm going to object and</p> <p>21 direct her not to answer.</p> <p>22 BY MR. KNOTT:</p> <p>23 Q In your experience, does crack cocaine have an impact</p> <p>24 on your ability to perceive events around you?</p> <p>25 MS. KLEINHAUS: I'm going to direct her not</p>	<p style="text-align: right;">Page 41</p> <p>1 specialist?</p> <p>2 A In my life?</p> <p>3 Q Yes.</p> <p>4 A Yes.</p> <p>5 Q Where?</p> <p>6 A Honestly I couldn't tell you. Since I was 12 years</p> <p>7 old, they have had me going to psychiatrists and</p> <p>8 therapists.</p> <p>9 Q And is it your practice when speaking to your</p> <p>10 psychiatrist and therapists to always tell them the</p> <p>11 truth?</p> <p>12 A Yes.</p> <p>13 Q That's important so that you can receive appropriate</p> <p>14 treatment?</p> <p>15 A I believe so.</p> <p>16 Q And so when you sought treatment following a relapse</p> <p>17 after March of 2014, you would have told them about</p> <p>18 all of the stressors in your life?</p> <p>19 A Correct.</p> <p>20 Q And you did that?</p> <p>21 A I did.</p> <p>22 Q You initially saw someone for psychiatric therapy in</p> <p>23 2010 -- I'm sorry, since you were 10 years old?</p> <p>24 MS. KLEINHAUS: Object to the form of the</p> <p>25 question. You can answer.</p>

<p style="text-align: right;">Page 42</p> <p>1 BY MR. KNOTT:</p> <p>2 Q Did you just tell me that you have been seeing</p> <p>3 therapists since you were 10 years old?</p> <p>4 A I said 12.</p> <p>5 Q And what resulted in your seeing a therapist at 12</p> <p>6 years old?</p> <p>7 A What resulted in or --</p> <p>8 Q Why did you see a therapist at 12 years old?</p> <p>9 A My mother passed away when I was 12, and shortly</p> <p>10 after that I went into foster homes. I was having</p> <p>11 trouble dealing with it, so I don't know if it was</p> <p>12 social workers or a foster parent that felt that</p> <p>13 maybe it would be beneficial.</p> <p>14 Q Did you live with your mother?</p> <p>15 A I lived with my mother and father.</p> <p>16 Q And when your mother passed away, you went in foster</p> <p>17 homes?</p> <p>18 A A few months after my mother passed away.</p> <p>19 Q And how many foster homes did you live in?</p> <p>20 A I don't know the exact number.</p> <p>21 Q Have you ever been subject to physical violence in</p> <p>22 the past?</p> <p>23 A In general?</p> <p>24 Q Ever.</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 44</p> <p>1 therapists, from the time I was 12 to 18, I don't</p> <p>2 really have a great chronological memory of when I</p> <p>3 saw who.</p> <p>4 Q Did that event, and your life in foster homes, cause</p> <p>5 you to feel anxiety?</p> <p>6 A At that time.</p> <p>7 Q And did you begin to use street drugs in order to, as</p> <p>8 you said, self-medicate for anxiety?</p> <p>9 MS. KLEINHAUS: Just object to form as to</p> <p>10 the time, but you can answer.</p> <p>11 THE WITNESS: No. Not -- no.</p> <p>12 BY MR. KNOTT:</p> <p>13 Q Is there a reason that you can give us for your use</p> <p>14 initially of street drugs?</p> <p>15 A Initially it was because my boyfriend was doing it,</p> <p>16 and it just -- he talked me into, "oh, this is so</p> <p>17 great," so I guess that would be considered peer</p> <p>18 pressure.</p> <p>19 Q You had attempted suicide in the past?</p> <p>20 A Yes.</p> <p>21 Q On how many occasions?</p> <p>22 A I don't know, maybe three or four when I was younger.</p> <p>23 Again, when I say "younger," I mean between 12 and</p> <p>24 maybe 15.</p> <p>25 Q And how did you attempt suicide?</p>
<p style="text-align: right;">Page 43</p> <p>1 Q At -- when?</p> <p>2 A When I was younger.</p> <p>3 Q What's that mean, when you were younger? You will</p> <p>4 need to be more specific.</p> <p>5 A Before 18. Between 12 and 18.</p> <p>6 Q And can you tell me what happened?</p> <p>7 A To physical violence in general, I -- there were</p> <p>8 times that I would be in fights at school, like other</p> <p>9 kids picking on me or whatever. I witnessed violence</p> <p>10 through group homes that I was in. Same kind of</p> <p>11 thing, kids picking on each other. Then also at a</p> <p>12 foster home, the male figure in the household was</p> <p>13 physically violent to some of the foster children.</p> <p>14 Q And you witnessed that physical violence?</p> <p>15 A I did.</p> <p>16 Q Were you subject to that physical violence?</p> <p>17 A Once.</p> <p>18 Q And when was that?</p> <p>19 A Again, I'm not sure how old I was. It was between</p> <p>20 maybe 14 and 15.</p> <p>21 Q Did you seek any therapy as a result of being subject</p> <p>22 to abuse by a foster parent?</p> <p>23 A Yes, that was part of -- yes.</p> <p>24 Q Where did you receive that therapy?</p> <p>25 A I'm not sure in what -- because the different</p>	<p style="text-align: right;">Page 45</p> <p>1 A The times that I remember, with pills that were left</p> <p>2 over from my mom being sick.</p> <p>3 Q Did you suffer from depression prior to March 2014?</p> <p>4 A Yes, again, when I was younger.</p> <p>5 Q Were you -- did you obtain any treatment for</p> <p>6 depression after 2010?</p> <p>7 A After -- I'm sorry, after 2010?</p> <p>8 Q Right.</p> <p>9 A Until the present? Yes.</p> <p>10 Q And when did you initially receive treatment for</p> <p>11 depression?</p> <p>12 A I -- I couldn't tell you. I don't remember exactly.</p> <p>13 Q Was it with Dr. Allen?</p> <p>14 A No, it was when I was younger. Between the ages of</p> <p>15 12 and 15, like I said.</p> <p>16 Q Had any medications been prescribed for you to use</p> <p>17 when you were arrested on March 9, 2014?</p> <p>18 MS. KLEINHAUS: Just object to the form.</p> <p>19 You can answer, if you understand.</p> <p>20 THE WITNESS: I don't quite understand.</p> <p>21 Can you clarify?</p> <p>22 BY MR. KNOTT:</p> <p>23 Q Had anyone prescribed medication for you to use for</p> <p>24 any reason when you were arrested on March 9, 2014?</p> <p>25 A Not that I -- I mean, on March 9th, 2014, I didn't</p>

<p style="text-align: right;">Page 46</p> <p>1 see a doctor.</p> <p>2 Q No, the question is had anybody prescribed, prior to</p> <p>3 that date, any medications for you that were current</p> <p>4 medications when you were arrested?</p> <p>5 A No. Thank you for putting the "current" in.</p> <p>6 Q Have you been pregnant since 2014?</p> <p>7 A No.</p> <p>8 Q Have you received any gynecological care since 2014?</p> <p>9 A I have.</p> <p>10 Q Who is your OB/GYN?</p> <p>11 A I don't have a specific OB/GYN. I go to Planned</p> <p>12 Parenthood.</p> <p>13 Q And you see the physicians there?</p> <p>14 A Correct.</p> <p>15 Q And did you discuss with the physicians there the</p> <p>16 circumstance of the birth in the jail?</p> <p>17 A I believe at one time or another I did, yes.</p> <p>18 Q What do you recall discussing with the Planned</p> <p>19 Parenthood physicians?</p> <p>20 A I just explained how everything unfolded the night</p> <p>21 that I gave birth to Leland and -- yeah, that was it,</p> <p>22 just how everything unfolded.</p> <p>23 Q Any other physicians other than Dr. Allen and a</p> <p>24 physician at Planned Parenthood that you discussed</p> <p>25 the circumstance in March 2014 with?</p>	<p style="text-align: right;">Page 48</p> <p>1 Q And had you ever in your lifetime written one of</p> <p>2 those?</p> <p>3 A I don't know. I don't recall. I don't believe -- I</p> <p>4 don't know.</p> <p>5 Q You never -- have you ever written in any context a</p> <p>6 summary of what occurred to you in March 2014?</p> <p>7 A In what context, "a summary."</p> <p>8 Q Have you ever put down on paper what happened to you?</p> <p>9 A I have written specific parts of it in my journal.</p> <p>10 Is that what you're asking?</p> <p>11 Q Yes.</p> <p>12 A Yes.</p> <p>13 Q Do you have a journal?</p> <p>14 A I do.</p> <p>15 Q Did you bring it with you?</p> <p>16 A I did not. I have several different ones.</p> <p>17 Q How many do you have?</p> <p>18 A I don't know. I will write down in a notebook and</p> <p>19 then write down in a different notebook. It was a</p> <p>20 technique I learned when I was younger, to write down</p> <p>21 things to help deal with them.</p> <p>22 Q Oops, I think we're one short. I'm giving you a copy</p> <p>23 of the notice of deposition for today. Have you seen</p> <p>24 that before?</p> <p>25 A I don't remember seeing this.</p>
<p style="text-align: right;">Page 47</p> <p>1 A Um, no. No.</p> <p>2 Q Prior to March 2014, you had been in a correctional</p> <p>3 facility?</p> <p>4 A Correct.</p> <p>5 Q Had you been in facilities other than the Milwaukee</p> <p>6 County Jail?</p> <p>7 A Just one other time, yes.</p> <p>8 Q And where was that?</p> <p>9 A The House of Correction in Franklin.</p> <p>10 Q Okay. And did you know how to file a grievance in</p> <p>11 March 2014?</p> <p>12 A I had never done that before; so, no, I didn't.</p> <p>13 Q Did you know how to file or how to -- how to author a</p> <p>14 slip and get the attention of the guards or medical</p> <p>15 care?</p> <p>16 MS. KLEINHAUS: Just object to the form of</p> <p>17 the question. You can answer.</p> <p>18 BY MR. KNOTT:</p> <p>19 Q Do you know what a flag is?</p> <p>20 A No, I don't know what a flag is.</p> <p>21 Q A pink slip?</p> <p>22 A Oh, yes.</p> <p>23 Q And what is that?</p> <p>24 A I believe it's for medical attention; for, you know,</p> <p>25 a doctor's appointment or something to that effect.</p>	<p style="text-align: right;">Page 49</p> <p>1 MS. KLEINHAUS: So this is my fault. She</p> <p>2 has not seen this. I believe, as far as I know,</p> <p>3 everything that's responsive to numbers 1 through 4</p> <p>4 has been produced in discovery already. But if there</p> <p>5 is anything additional, obviously we will get it for</p> <p>6 you.</p> <p>7 BY MR. KNOTT:</p> <p>8 Q Ms. Terry, the first request is that you bring any</p> <p>9 and all records, charts, notes, memos, diaries, or</p> <p>10 other writings in your possession pertaining to the</p> <p>11 subject action of this lawsuit.</p> <p>12 Did I read that correctly?</p> <p>13 A Yes.</p> <p>14 Q And you've testified that you wrote in a journal</p> <p>15 about the events that occurred to you?</p> <p>16 A I have before, yes.</p> <p>17 Q Tell me about the journal. What kind of paper is it</p> <p>18 on? Is it a bound book?</p> <p>19 A There was several different notebooks that I would</p> <p>20 write different parts that might have bothered me or</p> <p>21 different nightmares that I might have had about it.</p> <p>22 There was one -- there was one -- there was a</p> <p>23 notebook, like a spiral notebook with a black cover.</p> <p>24 There was another journal. One of the most recent</p> <p>25 ones I had, it was -- it looked like a regular</p>

<p style="text-align: right;">Page 50</p> <p>1 hard-cover book. It's purple and white and speckled.</p> <p>2 There is a notebook that I have also that's like a</p> <p>3 subject notebook. It has stripes on the front and</p> <p>4 then like little flower things that divide the</p> <p>5 subject sections that I have written in about it.</p> <p>6 Q And in those -- each of those books you have written</p> <p>7 about your experience and what you're going through</p> <p>8 in your life; correct?</p> <p>9 A The experience at the jail that night or something</p> <p>10 pertaining to it in that way, yes.</p> <p>11 Q Had you ever written anything down about what</p> <p>12 happened prior to starting that journal?</p> <p>13 A Not that I -- not that I recall.</p> <p>14 Q Did you ever complain about your conditions of</p> <p>15 confinement in the jail before you were discharged</p> <p>16 from the jail?</p> <p>17 MS. KLEINHAUS: Just object to the form of</p> <p>18 the question in terms of what a complaint is, but go</p> <p>19 ahead and answer.</p> <p>20 THE WITNESS: I'm sorry, did you say before</p> <p>21 I left the jail did I complain about what was</p> <p>22 happening in the jail or what had happened?</p> <p>23 BY MR. KNOTT:</p> <p>24 Q Right.</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 52</p> <p>1 A I'm sure I did, but I don't recall everything that we</p> <p>2 talked about.</p> <p>3 Q And on how many occasions did you complain that you</p> <p>4 needed a washcloth or a blanket?</p> <p>5 A Once I got back to the jail, every day until I left.</p> <p>6 Q Anything else that you complained about?</p> <p>7 A I know I complained about not having like the proper</p> <p>8 sized pads for -- because the pads were too small</p> <p>9 that they were giving me after I had the baby, and I</p> <p>10 asked was there any way I could get larger pads for</p> <p>11 postpartum.</p> <p>12 Q And who did you talk to about that?</p> <p>13 A I don't know what the CO's name was. I asked a few</p> <p>14 different times, a few different occasions. I don't</p> <p>15 know what their names were.</p> <p>16 Q Any other complaints about the conditions of your</p> <p>17 confinement in March 2014?</p> <p>18 MS. KLEINHAUS: Just object to the form,</p> <p>19 "conditions of confinement." Go ahead.</p> <p>20 BY MR. KNOTT:</p> <p>21 Q Did you communicate any other complaints about your</p> <p>22 conditions of confinement in March 2014 to anyone,</p> <p>23 other than what we talked about?</p> <p>24 MS. KLEINHAUS: Same objection. Go ahead.</p> <p>25 THE WITNESS: I have talked to friends</p>
<p style="text-align: right;">Page 51</p> <p>1 Q And who did you complain to?</p> <p>2 A I complained to -- while I was -- I guess I'm kind</p> <p>3 of -- you mean as far as somebody listening to me</p> <p>4 when I complained? I complained to one of the guards</p> <p>5 that was in the hospital with me, because there was</p> <p>6 like three different shifts of sheriffs that would</p> <p>7 sit in the room with me. I don't recall what her</p> <p>8 name was. She was there mostly on the first shift.</p> <p>9 Then, again, when I got back to the jail,</p> <p>10 it wasn't so much the night of the birth, but things</p> <p>11 that I needed and complained about the treatment of</p> <p>12 not getting what I needed. I would complain to</p> <p>13 guards, I don't know their names, but they would have</p> <p>14 been in whatever pod I was in and complaining away.</p> <p>15 Like a specific complaint I had was I don't have</p> <p>16 washcloths, I don't have blankets. Can this</p> <p>17 please -- can you please get it for me; and things</p> <p>18 like that, of that nature.</p> <p>19 Q You -- what did you complain about to the female</p> <p>20 guard in the hospital?</p> <p>21 A I told her how when I had the baby, I kept screaming</p> <p>22 and screaming for help; and the guard, I felt, was</p> <p>23 ignoring me and wouldn't call for help and how I</p> <p>24 didn't understand why.</p> <p>25 Q Anything else you discussed with that guard?</p>	<p style="text-align: right;">Page 53</p> <p>1 about it. I have talked obviously to my lawyer. I</p> <p>2 have talked to -- well, I suppose I already said my</p> <p>3 doctor. Just -- yeah, it would just be people close</p> <p>4 in my life, like friends, my boyfriend, my lawyer.</p> <p>5 BY MR. KNOTT:</p> <p>6 Q And none of those were reduced to writing until you</p> <p>7 started your journals; correct?</p> <p>8 A Except for my lawyer and the complaint, correct.</p> <p>9 Q And when did you retain counsel for this matter?</p> <p>10 A I think it was last spring.</p> <p>11 Q And how did you locate the Loevy firm?</p> <p>12 A I heard about it on the -- I heard about the firm on</p> <p>13 the news because they were representing somebody else</p> <p>14 that had a case against Milwaukee County Jail.</p> <p>15 Q And up until that time, you had never complained to</p> <p>16 anyone other than the times that you have described</p> <p>17 in this deposition; fair?</p> <p>18 MS. KLEINHAUS: Object to form. You can</p> <p>19 answer.</p> <p>20 THE WITNESS: I'm sorry, I thought I</p> <p>21 answered it. Could you clarify the question again.</p> <p>22 BY MR. KNOTT:</p> <p>23 Q Yeah. We have talked about the complaints that you</p> <p>24 had and who you talked to them about while you were</p> <p>25 in the jail; correct?</p>

<p style="text-align: right;">Page 54</p> <p>1 MS. KLEINHAUS: Just object to form. Go 2 ahead. 3 THE WITNESS: I complained about the 4 condition and the situation while I was in the jail, 5 correct. 6 BY MR. KNOTT: 7 Q And we've talked about all of those conversations; 8 correct? 9 MS. KLEINHAUS: Just object to form. Go 10 ahead. 11 THE WITNESS: As far as I know -- no, I 12 also -- I'm sorry, I forgot. I also spoke to who I 13 know to be the nurse practitioner, the OB nurse 14 practitioner, when I returned back to the jail from 15 the hospital. 16 BY MR. KNOTT: 17 Q And who is that? 18 A I don't know what her name is. 19 Q And what did you talk to her about? 20 A I talked to her about what happened leaving -- from 21 the time I came to the jail leading up to the birth, 22 and then what happened when I got -- well, what 23 happened while I was at the hospital, and then also 24 what happened up until the point that I had seen her, 25 as far as what happened in the jail.</p>	<p style="text-align: right;">Page 56</p> <p>1 Q Do you know if an element of your damages in this 2 litigation is attorneys' fees? 3 MS. KLEINHAUS: Just object to the form of 4 the question; but you can answer, if you understand 5 it. 6 THE WITNESS: I -- I don't know. I don't 7 know what's -- no, I don't know. 8 BY MR. KNOTT: 9 Q Do you have a written agreement with the Loevy firm? 10 A I have a contract with them, correct. 11 Q And does it require that you pay fees? 12 MS. KLEINHAUS: I'm going to go ahead and 13 direct her not to answer. I'm not sure how this is 14 relevant to the lawsuit, but apart from that I think 15 it invades the privilege, so don't answer that 16 question. 17 BY MR. KNOTT: 18 Q Do you know how much your attorneys are charging per 19 hour for work on your behalf? 20 MS. KLEINHAUS: I think that invades the 21 privilege, so I'm directing you not to answer that. 22 BY MR. KNOTT: 23 Q Did you complain to anyone about the manner in which 24 you were restrained prior to speaking to the Loevy 25 firm?</p>
<p style="text-align: right;">Page 55</p> <p>1 Q And what do you mean by what happened at the 2 hospital, what happened at the jail? 3 A I mean, like what happened at the hospital as far as 4 when I got to the hospital with the -- after I had 5 given birth. While I was at the hospital, any, you 6 know, treatment that I received. And then just not 7 having what I needed once I came back to the jail. 8 Q Did you keep a journal about these events before 9 retaining counsel? 10 A Yes. 11 Q When did you start keeping a journal? 12 A I don't know. I have journaled off and on my whole 13 life, so I don't know specific -- 14 Q What journals -- how far back do journals in your 15 current possession go? 16 A I don't know, I would have to look at them. 17 Q Did you have an agreement with the Loevy firm to pay 18 their fees? 19 MS. KLEINHAUS: Just object that I think 20 that invades attorney/client privilege, so I'm going 21 to direct her not to answer that. 22 BY MR. KNOTT: 23 Q Are you seeking attorneys' fees in this litigation? 24 Do you know? 25 A I'm sorry, can you state that one more time?</p>	<p style="text-align: right;">Page 57</p> <p>1 MS. KLEINHAUS: Just object to the form of 2 the question. You can answer. 3 THE WITNESS: I complained of -- yes, yes, 4 I have. 5 BY MR. KNOTT: 6 Q So this would be a conversation that you haven't 7 shared with us yet; correct? 8 A I'm not sure what you mean, haven't shared with you. 9 In what way? 10 Q Tell me who you spoke to about the manner in which 11 you were restrained before speaking to the Loevy 12 firm? 13 MS. KLEINHAUS: Just object to the form of 14 the question. Go ahead and -- 15 THE WITNESS: It would have been in -- in 16 one of those general comments I made about speaking 17 to friends or my boyfriend, in that manner. The 18 treatment or the things that happened from the time I 19 came into the jail until the time I was discharged 20 from jail completely. 21 BY MR. KNOTT: 22 Q And did the information you saw about the Loevy firm 23 include information about restraint of pregnant 24 women? 25 MS. KLEINHAUS: Object to the form. You</p>

<p style="text-align: right;">Page 58</p> <p>1 can answer.</p> <p>2 THE WITNESS: Yes, that was part of the</p> <p>3 news story.</p> <p>4 BY MR. KNOTT:</p> <p>5 Q And you never spoke to anyone about your concerns</p> <p>6 about your restraints, other than friends, prior to</p> <p>7 retaining the Loevy firm; correct?</p> <p>8 MS. KLEINHAUS: Just object to the form.</p> <p>9 You can answer.</p> <p>10 THE WITNESS: Yeah, no, I didn't speak to</p> <p>11 anybody but friends and -- in that manner, yeah.</p> <p>12 BY MR. KNOTT:</p> <p>13 Q There is a gentleman waiting in our lobby, I believe</p> <p>14 came with you?</p> <p>15 A Correct.</p> <p>16 Q And who is that?</p> <p>17 A Just a friend of mine.</p> <p>18 Q What's his name?</p> <p>19 A Troy Bleskachek.</p> <p>20 Q You might have to spell that.</p> <p>21 A B-l-e-s-k-a-c-h-e-k, I believe. A lot of times I</p> <p>22 spell his name wrong.</p> <p>23 Q And you're living with your boyfriend's sister at</p> <p>24 this time?</p> <p>25 A Correct.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q And do you -- well, is the gentleman in the lobby the</p> <p>2 father of Dayton?</p> <p>3 A No.</p> <p>4 Q Is it the same name?</p> <p>5 A No.</p> <p>6 Q I misheard it. Could you spell that name?</p> <p>7 A Of Dayton's last name?</p> <p>8 Q Yes.</p> <p>9 A Lewkowski, L-e-w-k-o-w-s-k-i.</p> <p>10 Q Do you currently have custody of these three</p> <p>11 children?</p> <p>12 A I have shared custody but not placement of Jeremiah.</p> <p>13 I have shared custody with Dayton, but he is placed</p> <p>14 somewhere else; and then I do not have custody of</p> <p>15 Leland. I voluntarily gave up my custody or parental</p> <p>16 rights.</p> <p>17 Q Has Leland been adopted?</p> <p>18 A He has.</p> <p>19 Q Do you maintain contact with Leland?</p> <p>20 A I do.</p> <p>21 Q And where does he live?</p> <p>22 A In Racine.</p> <p>23 Q When you say you have shared custody of your other</p> <p>24 children but not placement, I assume that means that</p> <p>25 you still have parental rights, but you do not have</p>
<p style="text-align: right;">Page 59</p> <p>1 Q How long have you been living there?</p> <p>2 A For the last few months.</p> <p>3 Q Where did you live before that?</p> <p>4 A I was living with a lady named Debbie Lucas before</p> <p>5 that.</p> <p>6 Q What's the name?</p> <p>7 A Debbie Lucas.</p> <p>8 Q And who is Debbie Lucas?</p> <p>9 A A friend of my boyfriend's family. We were renting a</p> <p>10 basement room from her.</p> <p>11 Q Where was that?</p> <p>12 A In South Milwaukee. I don't recall the exact</p> <p>13 address. It was on Missouri Avenue.</p> <p>14 Q Did you have a permanent home in March 2014?</p> <p>15 A I did.</p> <p>16 Q Where?</p> <p>17 A On South Chicago Avenue. I don't recall the address.</p> <p>18 Q You would have shared that with anybody who</p> <p>19 interviewed you and asked you about your address?</p> <p>20 A I would believe so.</p> <p>21 Q You have children?</p> <p>22 A I do.</p> <p>23 Q What are their names and ages?</p> <p>24 A Jeremiah Cholip, Jr.; he is 14. Dayton Lewkowski; he</p> <p>25 is 7. And Leland Urbaniak, and he's 4.</p>	<p style="text-align: right;">Page 61</p> <p>1 those children live in your home any part of the week</p> <p>2 or month?</p> <p>3 A Correct. Excuse me one second.</p> <p>4 MS. KLEINHAUS: Sure. When it's a good</p> <p>5 time, can we take a short break.</p> <p>6 THE VIDEOGRAPHER: Going off the record at</p> <p>7 1:51 p.m.</p> <p>8 (Recess taken.)</p> <p>9 THE VIDEOGRAPHER: We're back on the record</p> <p>10 at 2:02 p.m.</p> <p>11 BY MR. KNOTT:</p> <p>12 Q Ms. Terry, we were talking about your children. Can</p> <p>13 you tell me approximately how many hours per week you</p> <p>14 spent with your two older children in March 2014</p> <p>15 before you were arrested?</p> <p>16 A I -- I don't know.</p> <p>17 Q Did you have -- did you have placement with them at</p> <p>18 all?</p> <p>19 A Ever in their lives?</p> <p>20 Q No, in 2014 before your arrest.</p> <p>21 A No.</p> <p>22 Q Have you been married?</p> <p>23 A I have.</p> <p>24 Q When were you married?</p> <p>25 A I got married shortly after I turned 18.</p>

<p style="text-align: right;">Page 62</p> <p>1 Q And who did you marry?</p> <p>2 A His name was John Terry.</p> <p>3 Q And was he the father of any of your children?</p> <p>4 A No.</p> <p>5 Q Who has custody and placement of Jeremiah?</p> <p>6 A It's -- his dad has placement.</p> <p>7 Q And has that always been the case?</p> <p>8 A Yeah, except for when we lived together, yes.</p> <p>9 Q And how long after Jeremiah's birth did you live together?</p> <p>10 A For approximately four years.</p> <p>12 Q And so that would have been until approximately 2008?</p> <p>13 A That sounds about right.</p> <p>14 Q And then after that you had no custodial or placement relationship with Jeremiah; true?</p> <p>15 MS. KLEINHAUS: Object to the form of the question and asked and answered. You can answer.</p> <p>18 BY MR. KNOTT:</p> <p>19 Q True?</p> <p>20 A True.</p> <p>21 Q So you're not claiming in this lawsuit that anything these defendants have done impacted your relationship with Jeremiah; true?</p> <p>22 A I am not.</p> <p>24 Q Is the same true with respect to Dayton?</p>	<p style="text-align: right;">Page 64</p> <p>1 Q And I assume that was because you were -- did not feel that you were in a position to properly provide care for Dayton; fair?</p> <p>2 A That is fair.</p> <p>3 Q And that was because of your addiction to street drugs; true?</p> <p>4 A That was -- that's not completely true, no. That was part of -- that was part of it.</p> <p>5 Q And what was the other part?</p> <p>6 A The situation -- like my legal situation, I had just gotten arrested for a crime and I was going in and out of jail.</p> <p>7 Q Which arrest are you referring to?</p> <p>8 A The arrest for the case for the possession with intent.</p> <p>9 Q And was that prior to March of 2014?</p> <p>10 A That was.</p> <p>11 Q So you did not have a placement relationship with Dayton in March 2014?</p> <p>12 A I did not.</p> <p>13 Q True?</p> <p>14 Do you know when you'd last seen him before you were arrested?</p> <p>15 A No, I'm not quite sure specifically, no.</p> <p>16 Q I think you testified that you began using heroin at</p>
<p style="text-align: right;">Page 63</p> <p>1 A Be -- I wouldn't -- no, that's not true.</p> <p>2 Q Dayton was born when?</p> <p>3 A Dayton is seven years old.</p> <p>4 Q So 2011?</p> <p>5 A Right.</p> <p>6 Q Did you have a relationship with his father?</p> <p>7 A I did.</p> <p>8 Q And did you have a custodial relationship with Dayton at any time?</p> <p>9 A I did.</p> <p>10 Q When?</p> <p>11 A Dayton lived with me until he was two, and then lived with me again from January 23rd of last year until July of last year.</p> <p>12 Q Who has primary custody of Dayton?</p> <p>13 A Primary placement of Dayton?</p> <p>14 Q Sure.</p> <p>15 A He is in a foster home right now.</p> <p>16 Q And did you have primary responsibility for Dayton until he was two years old?</p> <p>17 A I did.</p> <p>18 Q You lost custody of Dayton in approximately 2013?</p> <p>19 A Placement of him, yes.</p> <p>20 Q Did you contest that?</p> <p>21 A I did not.</p>	<p style="text-align: right;">Page 65</p> <p>1 age 26?</p> <p>2 A I think I misspoke on that. Opiates. So, yes.</p> <p>3 Q What specifically other than heroin?</p> <p>4 A I was using like Percocet 30s until I started using heroin.</p> <p>5 Q And was there ever -- from the time you started using heroin, was there ever a time when you were sober and not able to -- and not using heroin before March 2014?</p> <p>6 MS. KLEINHAUS: Just object to the form of the question.</p> <p>7 BY MR. KNOTT:</p> <p>8 Q Do you understand the question?</p> <p>9 A I do understand. There were -- yes, I had periods of sobriety.</p> <p>10 Q When was the last period of sobriety before March 2014?</p> <p>11 A I don't know specifically.</p> <p>12 Q How many days consecutively had you used heroin before you were arrested in March 2014?</p> <p>13 A I don't know specifically how many days in a row. I know I was a daily user, if that's what you're asking.</p> <p>14 Q Did you feel that your ability to function was impacted at all by your daily use?</p> <p>15</p>

<p style="text-align: right;">Page 66</p> <p>1 A My ability to function in -- as --</p> <p>2 Q To take care of yourself.</p> <p>3 A No, I understand what you're saying. My answer to</p> <p>4 that would be my ability to function in a normal</p> <p>5 societal way was affected by heroin use, correct.</p> <p>6 Q You lost custody or lost a placement relationship</p> <p>7 with Dayton in July of 2017?</p> <p>8 A Correct.</p> <p>9 Q And was that stressful for you?</p> <p>10 A Yes.</p> <p>11 Q Did it cause you sadness?</p> <p>12 A Yes.</p> <p>13 Q Did it cause you anger?</p> <p>14 A Yes.</p> <p>15 Q Did it cause you frustration?</p> <p>16 A Yes.</p> <p>17 Q And what led to your losing your placement</p> <p>18 relationship with Dayton in July 2017?</p> <p>19 A I was arrested for violation of probation.</p> <p>20 Q And what did you do that resulted in your arrest for</p> <p>21 a violation of probation?</p> <p>22 A I was in a car that was stopped that had -- a person</p> <p>23 in the car had illegal substances on their -- in</p> <p>24 their personal property, and that's a violation of</p> <p>25 probation.</p>	<p style="text-align: right;">Page 68</p> <p>1 Q And tell me how the events of March 2014 impacted</p> <p>2 your relationship with Dayton.</p> <p>3 A I became more distant from my son, at that point,</p> <p>4 Dayton. At that point I had a really hard time</p> <p>5 explaining to him that -- I had a hard time</p> <p>6 explaining to him that his brother was born in jail.</p> <p>7 Kids are just naturally inquisitive, so it was very</p> <p>8 hard to explain that, but it was also very hard to be</p> <p>9 around my son when I would have flashbacks, so I -- I</p> <p>10 didn't see him as much as I normally would have at</p> <p>11 that point.</p> <p>12 Q Was it humiliating to explain to your son that you</p> <p>13 were in jail?</p> <p>14 A No. No, it wasn't.</p> <p>15 Q So your testimony is that it was not humiliating to</p> <p>16 explain to your son that you were in jail, but it is</p> <p>17 humiliating to explain to your son that his brother</p> <p>18 was born in jail?</p> <p>19 A Can I elaborate on this?</p> <p>20 MS. KLEINHAUS: Just answer the question.</p> <p>21 I'm sorry, I can't advise you on it.</p> <p>22 THE WITNESS: My explanation on that is</p> <p>23 because the way I explained things to my son is in a</p> <p>24 teaching way. Grownups go to jail when they don't do</p> <p>25 what they're supposed to, and it was humiliating for</p>
<p style="text-align: right;">Page 67</p> <p>1 Q You personally had no drugs in your possession at</p> <p>2 that time?</p> <p>3 A I had no drugs in my possession, no, but I didn't get</p> <p>4 to finish what I was trying to say before.</p> <p>5 Q I'm sorry, go ahead.</p> <p>6 A I was trying to say, I also had drug paraphernalia in</p> <p>7 my purse that was also a violation of probation.</p> <p>8 Q And what was the drug paraphernalia in your purse?</p> <p>9 A It was heroin paraphernalia and crack cocaine</p> <p>10 paraphernalia.</p> <p>11 Q Were you using those drugs in the summer of 2017?</p> <p>12 A Yes, I had used those.</p> <p>13 Q And did that impact your relationship with others?</p> <p>14 A Not at that point. I had just relapsed.</p> <p>15 Q And how long before you were arrested had you</p> <p>16 relapsed?</p> <p>17 A Within a few days.</p> <p>18 Q And were you given a drug screen?</p> <p>19 A I was not.</p> <p>20 Q Did you spend time in a jail as a result of that?</p> <p>21 A Five days, yes.</p> <p>22 Q And who is your probation officer?</p> <p>23 A I'm no longer on probation.</p> <p>24 Q Who was your probation officer?</p> <p>25 A Mike Peterson.</p>	<p style="text-align: right;">Page 69</p> <p>1 me to explain about his brother being born in jail</p> <p>2 because I don't know what lesson he could learn from</p> <p>3 that.</p> <p>4 MR. RUSSART: What was the last part of</p> <p>5 that?</p> <p>6 (Testimony read aloud by reporter.)</p> <p>7 MS. KLEINHAUS: Thank you.</p> <p>8 BY MR. KNOTT:</p> <p>9 Q Did you maintain a relationship with Leland in 2014?</p> <p>10 A I did.</p> <p>11 Q When did you establish a relationship with Leland</p> <p>12 after discharge in -- from the jail? Did you have</p> <p>13 parental rights upon discharge from the jail?</p> <p>14 A I did not.</p> <p>15 Q In what context did you see Leland in 2014?</p> <p>16 A I -- I saw him a few times while he was still in the</p> <p>17 hospital, and then I had supervised visits with him</p> <p>18 through CPS.</p> <p>19 Q And when did you initiate the -- or someone else</p> <p>20 initiate on your behalf the process of terminating</p> <p>21 your parental rights to Leland?</p> <p>22 A I'm not sure of the date, but Leland was about 18</p> <p>23 months at that time, so I want to say around -- it</p> <p>24 was before I got out of -- I was in jail at that time</p> <p>25 as well, so I want to say the conversation came up</p>

<p style="text-align: right;">Page 70</p> <p>1 about August of -- what would that be, 2015? Yeah,</p> <p>2 2015, I believe.</p> <p>3 Q Let me understand. You did not have personal</p> <p>4 placement of Leland from the time of his birth for 18</p> <p>5 months; correct?</p> <p>6 A Correct.</p> <p>7 Q At some point after 18 months you were arrested</p> <p>8 again?</p> <p>9 A Before 18 months.</p> <p>10 Q Okay. Approximately how long after Leland was born</p> <p>11 were you arrested?</p> <p>12 A Approximately a little over a year.</p> <p>13 Q And what were you arrested for?</p> <p>14 A Probation violations again.</p> <p>15 Q And did that have to do with possession of narcotics?</p> <p>16 A No.</p> <p>17 Q What was the probation violation?</p> <p>18 A Absconding from my probation officer; and then there</p> <p>19 was a variety of different allegations, I don't</p> <p>20 remember exactly what they were.</p> <p>21 Q And none of them involved drugs?</p> <p>22 A It's possible that my probation officer asked me had</p> <p>23 I been using drugs or not. I would have been honest</p> <p>24 with him. So at that time, yes, I would have</p> <p>25 admitted to using drugs, but that wasn't the reason</p>	<p style="text-align: right;">Page 72</p> <p>1 issues are the result of the circumstance of his</p> <p>2 birth?</p> <p>3 A When speaking to the doctor, that was a concern that</p> <p>4 I had and I asked, because I had to clean his throat</p> <p>5 out, I had longer fingernails at the time, and I</p> <p>6 asked would that have been -- would the esophageal</p> <p>7 issues -- he said there was no way of knowing.</p> <p>8 Q And what doctor was that?</p> <p>9 A I forget what the doctor's name is. It's through</p> <p>10 Children's Hospital.</p> <p>11 Q When was Leland at Children's Hospital?</p> <p>12 A It was a doctor's office through Children's Hospital.</p> <p>13 Q And how many times did you see a doctor at Children's</p> <p>14 Hospital with Leland?</p> <p>15 MS. KLEINHAUS: Object to the form, but you</p> <p>16 can answer.</p> <p>17 THE WITNESS: A few. I mean, there was --</p> <p>18 he had quite a few different appointments through</p> <p>19 different doctors through Children's Hospitals --</p> <p>20 Children's Hospital, I'm sorry.</p> <p>21 BY MR. KNOTT:</p> <p>22 Q Were they normal pediatric checkups or did Leland</p> <p>23 have some other issue?</p> <p>24 A A combination of both.</p> <p>25 Q What other issue did he have?</p>
<p style="text-align: right;">Page 71</p> <p>1 for the arrest, but I believe that was part of the</p> <p>2 allegations or the -- I'm sorry, the violations.</p> <p>3 Q And your arrest at Leland's 18 months of life, at</p> <p>4 that time -- I'm sorry, at 11 months, your arrest at</p> <p>5 11 months led to you initiating the process of giving</p> <p>6 him up for adoption; true?</p> <p>7 A That -- the arrest wasn't what initiated it. At 18</p> <p>8 months that -- in Wisconsin, that's something that is</p> <p>9 discussed, if a child is still in -- placed in a CPS</p> <p>10 home or facility, that is something that comes up,</p> <p>11 and ultimately I decided to give up my rights.</p> <p>12 Q Your arrest at 11 months contributed to your decision</p> <p>13 to give up your rights?</p> <p>14 A Yeah, I suppose that played a part in it, yes.</p> <p>15 Q And do you agree that you were arrested due to your</p> <p>16 own conduct and not to the conduct of the defendants?</p> <p>17 A I -- yes, that -- yes.</p> <p>18 Q And you agree that you were in a vehicle in July of</p> <p>19 2017 with paraphernalia in your purse as a result of</p> <p>20 your conduct and not the conduct of the defendants?</p> <p>21 A Yes.</p> <p>22 Q Leland is healthy?</p> <p>23 A Yes, for the most part. He has esophageal issues.</p> <p>24 But besides that, yes, he's healthy.</p> <p>25 Q Has anybody suggested to you that the esophageal</p>	<p style="text-align: right;">Page 73</p> <p>1 A He had to have surgery on a double hernia. And when</p> <p>2 he was born, I don't know what the technical term is,</p> <p>3 the little string under his tongue went all the way</p> <p>4 to the tip of his tongue, so they had to cut it back.</p> <p>5 Q Were you told by anyone that either of those</p> <p>6 conditions were the result of the circumstance of his</p> <p>7 birth?</p> <p>8 A No.</p> <p>9 Q Were you told that any of those conditions were the</p> <p>10 result of your drug abuse --</p> <p>11 A No.</p> <p>12 Q -- during his gestation?</p> <p>13 A No, sir. Sorry, I didn't mean to interrupt.</p> <p>14 Q Was -- did Leland go through withdrawals at the time</p> <p>15 of birth?</p> <p>16 A Not at the time of birth that I know of. I know</p> <p>17 after birth he went through some form of withdrawals.</p> <p>18 Q And was that at -- was he treated at Aurora?</p> <p>19 A He was at Sinai Medical. I don't know if that's an</p> <p>20 Aurora facility.</p> <p>21 Q Say what it is?</p> <p>22 A Sinai. He was at Sinai, downtown.</p> <p>23 Q And how long was he in the hospital after you gave</p> <p>24 birth?</p> <p>25 A I believe it was around two weeks or approximately</p>

<p style="text-align: right;">Page 74</p> <p>1 two weeks.</p> <p>2 Q And was that for -- did he remain in the hospital for</p> <p>3 two weeks for any reason other than his withdrawal</p> <p>4 from the drugs that you had been using?</p> <p>5 MS. KLEINHAUS: Just object to form and</p> <p>6 foundation, but you can answer.</p> <p>7 THE WITNESS: Not to my knowledge.</p> <p>8 BY MR. KNOTT:</p> <p>9 Q Is Leland autistic?</p> <p>10 A No.</p> <p>11 Q When you were pregnant with Leland, did you have fear</p> <p>12 that you would be arrested?</p> <p>13 A Yes.</p> <p>14 Q And did that fear cause you to change your lifestyle?</p> <p>15 MS. KLEINHAUS: Object to the form of the</p> <p>16 question. You can answer.</p> <p>17 THE WITNESS: Yes.</p> <p>18 BY MR. KNOTT:</p> <p>19 Q How did you change your lifestyle in response to fear</p> <p>20 with your pregnancy?</p> <p>21 A I started living out of a hotel. I'm sorry, I didn't</p> <p>22 mean to interrupt. I thought you were finished.</p> <p>23 Q Go ahead.</p> <p>24 A I moved into a hotel believing that it would be</p> <p>25 harder for police to find me.</p>	<p style="text-align: right;">Page 76</p> <p>1 Q And you were aware of that on March 9, 2014; right?</p> <p>2 A Yes, I was.</p> <p>3 Q And you moved to a hotel in order to help evade</p> <p>4 arrest; true?</p> <p>5 A That is true.</p> <p>6 Q How were you informed that you had a warrant for your</p> <p>7 arrest?</p> <p>8 A Through speaking with the Justice Point worker.</p> <p>9 Q And how did you speak to the Justice Point worker?</p> <p>10 A On the phone, I believe, or voice mail. I'm not</p> <p>11 sure. I believe it was some form of telephone</p> <p>12 communication.</p> <p>13 Q When in relation to your arrest on March 9 did you</p> <p>14 speak to that Justice Point worker?</p> <p>15 A I'm not sure.</p> <p>16 Q You -- where were you living before you chose to go</p> <p>17 to the motel?</p> <p>18 A I was living on Columbia Avenue where I previously</p> <p>19 stated in South Milwaukee.</p> <p>20 Q And why would it be less likely that you would be</p> <p>21 arrested if you moved to a hotel?</p> <p>22 A My thoughts were that the police -- I didn't know the</p> <p>23 police in Franklin like I knew different police</p> <p>24 officers in South Milwaukee. I wouldn't be as</p> <p>25 recognized.</p>
<p style="text-align: right;">Page 75</p> <p>1 Q And by that you mean that you knew there was a</p> <p>2 warrant out for your arrest?</p> <p>3 A I did.</p> <p>4 Q And the warrant was for what?</p> <p>5 A I believe it was a bench warrant issued by -- by the</p> <p>6 judge on my case for not complying with Justice</p> <p>7 Point.</p> <p>8 Q And what was the requirement of Justice Point that</p> <p>9 you did not comply with?</p> <p>10 A I tried to -- it was supposed to be -- I was supposed</p> <p>11 to do a urine drop, and I sat there the allotted time</p> <p>12 and I wasn't able to go, and I didn't know I was</p> <p>13 supposed to go see a judge after that. That was -- I</p> <p>14 didn't realize. So I left, and I was informed that I</p> <p>15 had a warrant for my arrest.</p> <p>16 Q So you were required to give a urine sample as a</p> <p>17 result of a prior drug arrest; correct? True?</p> <p>18 A Correct.</p> <p>19 Q And your testimony is that you were not able to go,</p> <p>20 so you left, and didn't understand that that would</p> <p>21 result in a warrant; correct?</p> <p>22 A Correct.</p> <p>23 Q But you were later informed that you had a warrant</p> <p>24 out for your arrest; right?</p> <p>25 A Correct.</p>	<p style="text-align: right;">Page 77</p> <p>1 Q And while at the motel, you continued to use street</p> <p>2 drugs; correct?</p> <p>3 A Correct.</p> <p>4 Q Approximately how often per day were you injecting in</p> <p>5 March 2014 before your arrest?</p> <p>6 A I'm not sure. I know I was using daily. At least</p> <p>7 twice a day.</p> <p>8 Q Are you claiming that you're unable to work as a</p> <p>9 result of these events?</p> <p>10 A I'm not saying that I'm unable to work. It makes</p> <p>11 work much harder, or it has in the past. I'm sorry,</p> <p>12 let me correct that.</p> <p>13 Q What makes work much harder?</p> <p>14 A Different things, such as like the flashbacks. That</p> <p>15 was a major problem when working.</p> <p>16 Q Are you claiming --</p> <p>17 A Before, yeah.</p> <p>18 Q Are you claiming in this litigation that you lost</p> <p>19 wages as a result of the conduct of the defendants?</p> <p>20 MS. KLEINHAUS: Just object that it calls</p> <p>21 for a legal conclusion. You can answer.</p> <p>22 THE WITNESS: I -- no, I'm not. I guess</p> <p>23 I -- I don't know how to answer that exactly, that</p> <p>24 I -- I'm sorry.</p> <p>25</p>

<p style="text-align: right;">Page 78</p> <p>1 BY MR. KNOTT:</p> <p>2 Q Do you believe that you have lost income as a result</p> <p>3 of the conduct of the defendants?</p> <p>4 A I don't know if this would be a satisfying answer or</p> <p>5 not, but I believe because of what happened as a</p> <p>6 result of that night and as far as emotionally, in my</p> <p>7 way, it made it more difficult to work, so I don't</p> <p>8 know if that's a satisfying answer or not.</p> <p>9 Q All right. Are you working today?</p> <p>10 A I -- I work more part time, yeah.</p> <p>11 Q And where do you work part time?</p> <p>12 A Through a temp agency.</p> <p>13 Q What temp agency?</p> <p>14 A Staffing Partners.</p> <p>15 Q And what do you do?</p> <p>16 A It depends on what job -- the job assignment they</p> <p>17 send me.</p> <p>18 Q What primarily?</p> <p>19 A I have worked in a plastics factory -- I'm sorry, I'm</p> <p>20 trying to think of another one that I worked at</p> <p>21 primarily. Yeah, I guess that would be primarily the</p> <p>22 one that I worked at was the plastics factory.</p> <p>23 Q When did you last work there?</p> <p>24 A A few weeks ago.</p> <p>25 Q And how long have you worked for Staffing Partners?</p>	<p style="text-align: right;">Page 80</p> <p>1 arrested?</p> <p>2 A When I was arrested in March of 2014? Is that --</p> <p>3 Q Yeah.</p> <p>4 A No, I wasn't working there at the time of the arrest.</p> <p>5 Q How long had you worked there?</p> <p>6 A I worked there off and on since I was 16, so I</p> <p>7 don't -- yeah.</p> <p>8 Q Is that a family-owned relationship?</p> <p>9 A Not in relation to me, no.</p> <p>10 Q Okay. Have you worked at Sunrise Restaurant since</p> <p>11 2014?</p> <p>12 A I did.</p> <p>13 Q And when was that?</p> <p>14 A I'm not sure the exact date.</p> <p>15 Q You have referenced flashbacks. When did you first</p> <p>16 experience a flashback?</p> <p>17 A After I went to the hospital from the jail.</p> <p>18 Q Can you tell me when?</p> <p>19 A I'm sorry?</p> <p>20 Q Can you tell me when?</p> <p>21 A I don't know how many days after I was there.</p> <p>22 Q And did you tell anybody about it?</p> <p>23 A I -- I mentioned something about it to the addiction</p> <p>24 specialist doctor, but I don't know in how much</p> <p>25 detail.</p>
<p style="text-align: right;">Page 79</p> <p>1 MS. KLEINHAUS: Object to the form. You</p> <p>2 can answer.</p> <p>3 BY MR. KNOTT:</p> <p>4 Q Or worked through Staffing Partners.</p> <p>5 A I don't know. Not too long. A few months maybe.</p> <p>6 Q Were you working in March 2010?</p> <p>7 MS. KLEINHAUS: Do you mean 2014?</p> <p>8 BY MR. KNOTT:</p> <p>9 Q I'm sorry, 2014.</p> <p>10 A I was not.</p> <p>11 Q Did you file a tax return in 2010?</p> <p>12 MS. KLEINHAUS: You mean 2014?</p> <p>13 BY MR. KNOTT:</p> <p>14 Q No, go ahead, 2010.</p> <p>15 A I'm not sure.</p> <p>16 Q Did you file a tax return in 2011?</p> <p>17 A I'm not sure.</p> <p>18 Q 2012?</p> <p>19 A I'm not sure the last time I filed one was.</p> <p>20 Q Where had you last worked prior to your arrest in</p> <p>21 March 2014?</p> <p>22 A Sunrise Restaurant.</p> <p>23 Q What did you do there?</p> <p>24 A I was a waitress and hostess.</p> <p>25 Q And did you hold that position when you were</p>	<p style="text-align: right;">Page 81</p> <p>1 Q And I'm talking about during the time that you were</p> <p>2 hospitalized at Sinai.</p> <p>3 A Uh-huh.</p> <p>4 Q You spoke to the addiction specialist about it? Is</p> <p>5 that what you're saying?</p> <p>6 A I believe so, yes.</p> <p>7 Q And have the flashbacks changed in their nature since</p> <p>8 that day?</p> <p>9 MS. KLEINHAUS: Objection to form.</p> <p>10 BY MR. KNOTT:</p> <p>11 Q More frequent; less frequent?</p> <p>12 MS. KLEINHAUS: Go ahead.</p> <p>13 THE WITNESS: I -- at times they are more</p> <p>14 frequent than other times, yes.</p> <p>15 BY MR. KNOTT:</p> <p>16 Q What is it that seems to make them more frequent?</p> <p>17 MS. KLEINHAUS: Objection; foundation. You</p> <p>18 can answer.</p> <p>19 THE WITNESS: I don't know what makes them</p> <p>20 come on more than other times.</p> <p>21 BY MR. KNOTT:</p> <p>22 Q What do you see when you have a flashback?</p> <p>23 A I see myself primarily back in the jail cell at the</p> <p>24 infirmary. It's different at times. Sometimes I'm</p> <p>25 screaming at the door for the guard to help me.</p>

<p style="text-align: right;">Page 82</p> <p>1 Sometimes I'm trying not to push and screaming at the</p> <p>2 guard that I'm trying to wait for someone to come,</p> <p>3 and other times altogether I see my son laying on the</p> <p>4 bed in the cell not being able to breathe, and then</p> <p>5 sometimes it's a culmination of all of that.</p> <p>6 Q Do you experience flashbacks while you're awake or --</p> <p>7 A I do.</p> <p>8 Q -- are we talking about nightmares?</p> <p>9 A I don't consider those to be the same thing.</p> <p>10 Q When did you last experience a flashback?</p> <p>11 A I don't know the exact date. It was within the last</p> <p>12 few weeks when I was at Walmart.</p> <p>13 Q Any idea who triggered that event at Walmart?</p> <p>14 A I don't know.</p> <p>15 Q How often do you have flashbacks, say, in a month?</p> <p>16 A Again, sometimes it's more frequent than others, so I</p> <p>17 can't really answer that truthfully, because some</p> <p>18 months it will be four times, some months it will be</p> <p>19 ten times.</p> <p>20 Q How about this year?</p> <p>21 A I have never kept track of them, that close.</p> <p>22 Q Do you journal about your flashbacks?</p> <p>23 A I have journaled about -- yeah, to some degree, yes.</p> <p>24 Q Has there been any -- have you taken any therapy</p> <p>25 other than medications to deal with flashbacks?</p>	<p style="text-align: right;">Page 84</p> <p>1 Did your use of street drugs impact your</p> <p>2 perception of nightmares?</p> <p>3 MS. KLEINHAUS: Object to form and</p> <p>4 foundation. Go ahead.</p> <p>5 THE WITNESS: It eliminated them.</p> <p>6 BY MR. KNOTT:</p> <p>7 Q And what drugs eliminated nightmares?</p> <p>8 A Primarily -- I'm sorry?</p> <p>9 Q Go ahead.</p> <p>10 A Primarily heroin.</p> <p>11 Q Any other drugs that you use to address nightmares?</p> <p>12 A Not nightmares, no.</p> <p>13 Q Any other drugs that you use to address symptoms that</p> <p>14 you think resulted from the conduct of the</p> <p>15 defendants?</p> <p>16 MS. KLEINHAUS: Just object to form and</p> <p>17 foundation. I'm going to direct her not to answer</p> <p>18 questions about street drugs from after this</p> <p>19 incident.</p> <p>20 BY MR. KNOTT:</p> <p>21 Q You testified that your use of heroin got rid of</p> <p>22 nightmares; correct?</p> <p>23 A Correct.</p> <p>24 Q And that was before you got to Dr. Allen; right?</p> <p>25 A When I was using before I got to Dr. Allen, correct.</p>
<p style="text-align: right;">Page 83</p> <p>1 A No, until recently, besides speaking to the doctor at</p> <p>2 Sinai, I -- I really didn't talk about it except for</p> <p>3 when I finally talked to Dr. Timothy Allen because I</p> <p>4 didn't understand what they were.</p> <p>5 Q You also experience nightmares?</p> <p>6 A Yes.</p> <p>7 Q How often do you experience nightmares?</p> <p>8 A Now I don't, as long as I take my medication. Before</p> <p>9 that, it was pretty much every time I would go to</p> <p>10 sleep.</p> <p>11 Q And I'm sorry, when did you first see Dr. Allen and</p> <p>12 start on the medication that addresses nightmares?</p> <p>13 A Like I said, I believe it was in the last two -- two</p> <p>14 years, approximately, that I have been seeing him.</p> <p>15 Q And you experience nightmares every night from the</p> <p>16 time this happened until the time you were started on</p> <p>17 medication to address that; correct?</p> <p>18 A Not just every night. Any time I go to sleep.</p> <p>19 Q And the medication has been effective such that you</p> <p>20 don't suffer nightmares any longer; true?</p> <p>21 A As long as I take the medication before I go to</p> <p>22 sleep. If I fall asleep like on a road trip or</p> <p>23 something like that, I still will have the</p> <p>24 nightmares.</p> <p>25 Q Did your impact -- or excuse me.</p>	<p style="text-align: right;">Page 85</p> <p>1 Q And in your response, you indicated to me, I think,</p> <p>2 that your use of other drugs, other than heroin,</p> <p>3 somehow impacted your experience of your symptoms; is</p> <p>4 that true?</p> <p>5 A I know what you're talking about, yeah, it is -- yes.</p> <p>6 Q Is it your testimony that you used street drugs in</p> <p>7 order to address symptoms that resulted from the</p> <p>8 conduct of the defendants?</p> <p>9 A I'm sorry, I misspoke on the last question. Can I go</p> <p>10 back and explain what I meant? Not necessarily</p> <p>11 street drugs, but like medication to help me sleep is</p> <p>12 more what I was thinking of when I said -- when I was</p> <p>13 speaking about treating or self-medicating for those</p> <p>14 symptoms. I'm sorry to go back.</p> <p>15 Q I'm not sure how far we're going back, but you have</p> <p>16 testified that you used heroin to self-treat for what</p> <p>17 you believe is distress resulting from the conduct of</p> <p>18 the defendants; correct?</p> <p>19 A At times, yes, correct.</p> <p>20 Q And I have tried to establish when that is and how</p> <p>21 much you were using, and your counsel has instructed</p> <p>22 you not to answer.</p> <p>23 MR. KNOTT: Is that still your position,</p> <p>24 counsel?</p> <p>25 MS. KLEINHAUS: That's my position. We're</p>

<p style="text-align: right;">Page 86</p> <p>1 not seeking damages for any street drug use as a</p> <p>2 result of what happened in this incident.</p> <p>3 BY MR. KNOTT:</p> <p>4 Q And what drugs did you take to help you sleep and</p> <p>5 address your nightmares?</p> <p>6 A It wouldn't have been for it to address the</p> <p>7 nightmares. But sometimes to force myself to go to</p> <p>8 sleep, I will take over-the-counter sleep</p> <p>9 medications, like NyQuil or sleep aids, things of</p> <p>10 that nature.</p> <p>11 Q And would you still experience nightmares when you</p> <p>12 would use those over-the-counter drugs?</p> <p>13 A Yes.</p> <p>14 Q Are you alleging that you suffered a physical injury</p> <p>15 as a result of the conduct of the defendants?</p> <p>16 MS. KLEINHAUS: Object to form. You can</p> <p>17 answer, if you understand that.</p> <p>18 THE WITNESS: I -- I mean, the only</p> <p>19 physical injury that I know of was the tearing. I</p> <p>20 don't know -- I don't know if that was a result of --</p> <p>21 I don't know if that would have -- I'm not a doctor.</p> <p>22 I don't know if that would have happened had I been</p> <p>23 in a hospital or been delivering by myself or if a</p> <p>24 doctor was there or not.</p> <p>25</p>	<p style="text-align: right;">Page 88</p> <p>1 emotional damages you're claiming as a result of the</p> <p>2 conduct of the defendants? I want to make sure that</p> <p>3 we talked about everything that you're claiming in</p> <p>4 terms of impact on your -- on you emotionally?</p> <p>5 MS. KLEINHAUS: I will just object to form.</p> <p>6 You can go ahead.</p> <p>7 THE WITNESS: I'm -- can you say that one</p> <p>8 more time? Because I'm not sure I understand what</p> <p>9 you're asking me exactly.</p> <p>10 BY MR. KNOTT:</p> <p>11 Q Have we talked about all of the emotional symptoms</p> <p>12 that you're claiming resulted from the conduct of the</p> <p>13 defendants?</p> <p>14 A Like lasting emotional symptoms or --</p> <p>15 Q Yeah.</p> <p>16 A -- even that night?</p> <p>17 Q No, that you experience today.</p> <p>18 A Yeah, I believe so, yes.</p> <p>19 Q Are there any symptoms that -- other than nightmares,</p> <p>20 that you experienced in the past that have resolved?</p> <p>21 MS. KLEINHAUS: Objection to form. You can</p> <p>22 answer.</p> <p>23 THE WITNESS: I -- besides answering the</p> <p>24 question, I want to interject, and I don't -- because</p> <p>25 I don't think that the nightmares have resolved. I</p>
<p style="text-align: right;">Page 87</p> <p>1 BY MR. KNOTT:</p> <p>2 Q Are you claiming that your -- that you continue to</p> <p>3 experience any physical injury as a result of conduct</p> <p>4 of the defendants?</p> <p>5 A I'm sorry, did you say I continued to experience</p> <p>6 physical injury?</p> <p>7 Q Yes.</p> <p>8 A No.</p> <p>9 Q Do you contend that you experience fear after -- that</p> <p>10 you continue to experience fear as a result of the</p> <p>11 conduct of the defendants?</p> <p>12 A Yes.</p> <p>13 Q And what fear? How does that manifest itself?</p> <p>14 A I mean, I think I said before, you know, the fear is</p> <p>15 from the flashbacks, nightmares. But also I have</p> <p>16 been to jail since then, and it's -- in way like -- I</p> <p>17 have been to jail before this happened, I have been</p> <p>18 to jail after this happened, and I'm just afraid of</p> <p>19 having any kind of medical issue or when I go to</p> <p>20 jail, or when I have gone to jail or medical</p> <p>21 emergency, not being treated. I'm afraid to talk to</p> <p>22 police sometimes because I'm afraid that they will</p> <p>23 find a reason for me to go to jail. But I think that</p> <p>24 answers that.</p> <p>25 Q Anything else in terms of your emotional -- any other</p>	<p style="text-align: right;">Page 89</p> <p>1 think that with medication I can control nightmares</p> <p>2 as far as not having them; but if I don't take it,</p> <p>3 it's not resolved.</p> <p>4 However, to answer your question, is there</p> <p>5 any -- you said is there anything else that I'm still</p> <p>6 experiencing. Like emotionally that has not been</p> <p>7 resolved? Is that correct?</p> <p>8 BY MR. KNOTT:</p> <p>9 Q I think we already talked about that, so my question</p> <p>10 is anything that you would experience that had</p> <p>11 resolved before today.</p> <p>12 A No.</p> <p>13 Q Had anyone prior to Dr. Allen diagnosed you with</p> <p>14 PTSD?</p> <p>15 A No, I have never had to -- no, no.</p> <p>16 Q Any time after the events and before seeing Dr.</p> <p>17 Allen, did anyone tell you that you had PTSD?</p> <p>18 A I have had people suggest that what I was saying to</p> <p>19 them sounded like that maybe I should see a doctor.</p> <p>20 Q But I'm talking about a healthcare provider.</p> <p>21 A Oh, no.</p> <p>22 Q Is your memory of the events of March 9 impaired in</p> <p>23 any way by use of street drugs?</p> <p>24 A No.</p> <p>25 Q You were arrested in, was it, Franklin?</p>

<p style="text-align: right;">Page 90</p> <p>1 A Correct.</p> <p>2 Q And you were in possession of crack cocaine; correct?</p> <p>3 A No, I was not.</p> <p>4 Q Were you charged with possession of crack cocaine?</p> <p>5 A On March 9th?</p> <p>6 Q Yeah.</p> <p>7 A No, I was not.</p> <p>8 Q And so you had not used crack cocaine immediately prior to your arrest?</p> <p>9</p> <p>10 A I believe I stated earlier, I used it earlier that day, but I was not in possession of crack cocaine when I was arrested.</p> <p>11</p> <p>12</p> <p>13 Q Was anybody in your room in possession of crack cocaine?</p> <p>14</p> <p>15 A I was arrested in someone else's room.</p> <p>16 Q Was anybody in that room in possession of crack cocaine?</p> <p>17</p> <p>18 A I'm not sure. I don't know if they found her with just paraphernalia or if they found her with drugs as well. I think they may have found her with drugs as well.</p> <p>19</p> <p>20</p> <p>21</p> <p>22 Q Had you at any time prior to your arrest experienced anything that you thought were labor pains?</p> <p>23</p> <p>24 A No.</p> <p>25 Q Had you --</p>	<p style="text-align: right;">Page 92</p> <p>1 an impact on the child; true?</p> <p>2 A At the Milwaukee County Jail, I was told that it could lead to early labor and withdrawals.</p> <p>3</p> <p>4 Q Any other impact?</p> <p>5 A Not that I remember.</p> <p>6 Q And the withdrawals would be for the child; correct?</p> <p>7 A Oh, yes, that's --</p> <p>8 Q You were aware that the child could be born addicted to heroin?</p> <p>9</p> <p>10 A I -- that's my understanding of withdrawals, is you withdraw when your body is addicted to heroin.</p> <p>11</p> <p>12 Q You were aware of that since at least December of 2013; correct?</p> <p>13</p> <p>14 A Correct.</p> <p>15 Q And you continued to use heroin and crack cocaine with knowledge that it could cause that impact on your child; correct?</p> <p>16</p> <p>17</p> <p>18 A Yes.</p> <p>19 Q And you continued to use those drugs by your own choice and not as a result of conduct of these defendants; true?</p> <p>20</p> <p>21</p> <p>22 MS. KLEINHAUS: Object to form as to the time frame. Go ahead.</p> <p>23</p> <p>24 THE WITNESS: Correct, nobody made me use drugs but myself.</p> <p>25</p>
<p style="text-align: right;">Page 91</p> <p>1 A Not for this pregnancy, no.</p> <p>2 Q Had you at any time since your release from the Milwaukee County Jail sought any healthcare whatsoever before your arrest on March 9th?</p> <p>3</p> <p>4</p> <p>5 MS. KLEINHAUS: I will object to the form of the question, but go ahead.</p> <p>6</p> <p>7 BY MR. KNOTT:</p> <p>8 Q You were in jail -- the Milwaukee County Jail in about December of 2013; correct?</p> <p>9</p> <p>10 A I think so, yes.</p> <p>11 Q And from the time of your discharge from the jail to the time of your arrest, have you sought any healthcare whatsoever?</p> <p>12</p> <p>13</p> <p>14 A No.</p> <p>15 Q Were you concerned about the health of your unborn child?</p> <p>16</p> <p>17 A I was.</p> <p>18 Q Did it cause you distress that you were using drugs with a child about to be born?</p> <p>19</p> <p>20 A Did it cause -- I'm sorry, did it cause me distress that -- because I was using drugs?</p> <p>21</p> <p>22 Q Correct.</p> <p>23 A Yes.</p> <p>24 Q And you had been counseled at the Milwaukee County Jail prior to that, that your use of heroin can have</p>	<p style="text-align: right;">Page 93</p> <p>1 BY MR. KNOTT:</p> <p>2 Q And that caused you emotional distress, that you were continuing to use drugs knowing that it has an impact on your unborn child; correct?</p> <p>3</p> <p>4</p> <p>5 MS. KLEINHAUS: Just object to asked and answered. You can answer again.</p> <p>6</p> <p>7 THE WITNESS: Yes.</p> <p>8 BY MR. KNOTT:</p> <p>9 Q You had experienced a number of miscarriages prior to March of 2014; correct?</p> <p>10</p> <p>11 A Correct.</p> <p>12 Q And did you suffer those miscarriages while you were using heroin?</p> <p>13</p> <p>14 A Not most of them, no.</p> <p>15 Q Had you ever suffered a miscarriage while using street drugs?</p> <p>16</p> <p>17 A I believe one miscarriage was while using street drugs.</p> <p>18</p> <p>19 Q I'm sorry?</p> <p>20 A I believe one miscarriage was while using street drugs.</p> <p>21</p> <p>22 Q And when was that?</p> <p>23 A Before March 2014, but after I was 26. I don't know exact time frame. Actually, it would have been after Dayton was born, so that slims it down a little bit</p> <p>25</p>

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<p>1 more.</p> <p>2 Q And were you told at that time that your use of</p> <p>3 heroin or other street drugs may have contributed to</p> <p>4 that miscarriage?</p> <p>5 A I was not.</p> <p>6 Q Was it a concern while you were carrying Leland that</p> <p>7 your drug use could result in a miscarriage?</p> <p>8 A No. No.</p> <p>9 Q Did it cause you anxiety that your use of drugs could</p> <p>10 impact your unborn child?</p> <p>11 A Yes.</p> <p>12 Q And when you were arrested, you initially gave the</p> <p>13 arresting officer two false names; correct?</p> <p>14 A That is correct.</p> <p>15 Q And you gave the officer two false names because you</p> <p>16 wanted to avoid that bench warrant; correct?</p> <p>17 A No, I wanted to avoid having my child in jail.</p> <p>18 Q You gave two false names because you wanted to not be</p> <p>19 taken to jail?</p> <p>20 A Correct.</p> <p>21 Q Did you ever volunteer your own name?</p> <p>22 A I don't know if I volunteered it. Not until after</p> <p>23 they knew what my name was, I don't think.</p> <p>24 Q The police report indicates that you had injected</p> <p>25 heroin minutes before the police arrived. Do you</p>	<p>1 A With handcuffs behind my back.</p> <p>2 Q And did that cause you any distress?</p> <p>3 A It was extremely uncomfortable. I mean, I was in the</p> <p>4 back of a paddy-wagon being jostled around. It was</p> <p>5 hard to keep my balance.</p> <p>6 Q Did you tell anyone at that time that you shouldn't</p> <p>7 be restrained that way because you're pregnant?</p> <p>8 A No.</p> <p>9 Q You were arrested with a gentleman named Corey</p> <p>10 Toliver?</p> <p>11 A That is correct.</p> <p>12 Q Do you have a relationship with Mr. Toliver today?</p> <p>13 A Today, no.</p> <p>14 Q Was Mr. Toliver a drug dealer?</p> <p>15 A He was.</p> <p>16 Q Did he have access to a car?</p> <p>17 A Yes.</p> <p>18 Q At that time?</p> <p>19 A Yes.</p> <p>20 Q Did you communicate with Mr. Toliver at any time</p> <p>21 after your arrest and before giving birth?</p> <p>22 MS. KLEINHAUS: Object to the form of the</p> <p>23 question. You can answer.</p> <p>24 THE WITNESS: He was allowed to say</p> <p>25 good-bye to me in the Franklin Police Department.</p>
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<p>1 dispute that?</p> <p>2 A I do.</p> <p>3 Q How long prior to the police arriving had you</p> <p>4 injected heroin?</p> <p>5 A Earlier I think I answered that. I don't know</p> <p>6 exactly how long, but I know it was daytime.</p> <p>7 Q And where were you taken after your arrest?</p> <p>8 A To the Franklin Police Department.</p> <p>9 Q Were you put in a cell there?</p> <p>10 A I was.</p> <p>11 Q Did you see any medical personnel?</p> <p>12 A I did not.</p> <p>13 Q Do you know how long you were under arrest before you</p> <p>14 were transported to the Milwaukee County Jail?</p> <p>15 A I don't know specifically. I know that when I was</p> <p>16 transported it was again daylight, and I asked the</p> <p>17 guard -- or the officer, and they said it was around</p> <p>18 lunchtime.</p> <p>19 Q Were you restrained in any way when you were</p> <p>20 transported from Franklin to the Milwaukee County</p> <p>21 Jail?</p> <p>22 A Yes, I was.</p> <p>23 Q I'm sorry?</p> <p>24 A Yes, I was.</p> <p>25 Q How were you restrained?</p>	<p>1 BY MR. KNOTT:</p> <p>2 Q He was allowed to what?</p> <p>3 A Say good-bye to me. They were releasing him.</p> <p>4 Q So he was released from custody and you were taken to</p> <p>5 Milwaukee County Jail?</p> <p>6 A Yes, sir.</p> <p>7 Q And did you speak to anyone when you were in custody</p> <p>8 in Franklin?</p> <p>9 A Besides officers?</p> <p>10 Q Right.</p> <p>11 A No, not that I know of.</p> <p>12 Q Did you speak to anyone other than officers and staff</p> <p>13 at the Milwaukee County Jail and Franklin Jail on</p> <p>14 March 9 before you were taken to Froedtert?</p> <p>15 MS. KLEINHAUS: Object to form. You can</p> <p>16 answer.</p> <p>17 THE WITNESS: You said besides officers of</p> <p>18 Franklin Jail or jail staff?</p> <p>19 BY MR. KNOTT:</p> <p>20 Q Yeah, I'm trying to ask whether you'd spoke to anyone</p> <p>21 outside of law enforcement before you were taken to</p> <p>22 Froedtert.</p> <p>23 A Except for the nurse at the jail, no.</p> <p>24 Q Did you experience anything that you thought might be</p> <p>25 labor pains prior to arriving at the Milwaukee County</p>

<p style="text-align: right;">Page 98</p> <p>1 Jail?</p> <p>2 A No.</p> <p>3 Q Tell me what you remember about the Milwaukee County</p> <p>4 Jail when you arrived there. Tell me -- you felt no</p> <p>5 labor pains at that time -- correct? -- when you</p> <p>6 arrived?</p> <p>7 A No. When I arrived, they handcuffed me to a wooden</p> <p>8 bench and I saw a nurse shortly after that. Well,</p> <p>9 they asked me to pee in a cup and then go see the</p> <p>10 nurse shortly after that, and that's when I told her</p> <p>11 I was experiencing pressure, and she made the call to</p> <p>12 send me.</p> <p>13 Q So a short time after you arrived at the Milwaukee</p> <p>14 County Jail, you were asked to give a urine sample;</p> <p>15 correct?</p> <p>16 A Correct.</p> <p>17 Q And a short time after that, you saw a nurse in</p> <p>18 booking?</p> <p>19 A Yes, sir.</p> <p>20 Q And you described for that nurse that you had been</p> <p>21 using heroin; correct?</p> <p>22 A Yeah, that's where I would have told her, I believe.</p> <p>23 Q And you told her that you had no prenatal care;</p> <p>24 correct?</p> <p>25 A Correct.</p>	<p style="text-align: right;">Page 100</p> <p>1 felt like?</p> <p>2 A Yes, sir.</p> <p>3 Q You did not describe to that nurse that you were</p> <p>4 experiencing contractions before going to Froedtert;</p> <p>5 correct?</p> <p>6 A No, because that's not what I was feeling.</p> <p>7 Q So you did not describe to her that you were</p> <p>8 experiencing contractions; correct?</p> <p>9 A I don't -- I don't think that it was contractions</p> <p>10 that I explained to her. I remember saying feeling</p> <p>11 pressure low. I don't remember if I said that to</p> <p>12 her. About contractions, I mean.</p> <p>13 Q I just asked you that question, and your answer was:</p> <p>14 I didn't use that word because that's not what I was</p> <p>15 experiencing; correct?</p> <p>16 A I'm -- yes, that is what I said.</p> <p>17 Q Yeah. And that's the truth; right?</p> <p>18 A I'm sorry?</p> <p>19 Q That is correct.</p> <p>20 A That's not what I remember experiencing, that is</p> <p>21 correct. I remember feeling extreme pressure in the</p> <p>22 lower abdomen.</p> <p>23 Q Had you ever experienced that feeling of pressure in</p> <p>24 the lower abdomen during that pregnancy prior to</p> <p>25 March 9th?</p>
<p style="text-align: right;">Page 99</p> <p>1 Q And you felt pressure at that time?</p> <p>2 A Correct, yes.</p> <p>3 Q And what did the nurse say to you?</p> <p>4 A She -- I believe she asked me when my due date was,</p> <p>5 and I told her that it was that day. And I don't</p> <p>6 remember her saying too much more to me. She went</p> <p>7 and spoke to someone else. I was put back on the</p> <p>8 bench until I was eventually taken to Froedtert.</p> <p>9 Q You told her that you were due that day?</p> <p>10 A Yes, sir.</p> <p>11 Q And that the word you used when describing what you</p> <p>12 were experiencing was pressure?</p> <p>13 A Yeah, lower abdomen pressure.</p> <p>14 Q And was it constant?</p> <p>15 A Yes.</p> <p>16 Q And that occurred after you arrived at Milwaukee</p> <p>17 County Jail?</p> <p>18 A Yes.</p> <p>19 Q Did that change at all before you arrived at</p> <p>20 Froedtert?</p> <p>21 A No, I don't recall.</p> <p>22 Q And you had given birth to two children before this;</p> <p>23 right?</p> <p>24 A Yes, sir.</p> <p>25 Q So you knew what contraction -- what contractions</p>	<p style="text-align: right;">Page 101</p> <p>1 A No.</p> <p>2 Q Have you ever been told that you were experiencing</p> <p>3 pain in the lower abdomen as a result of the child</p> <p>4 laying on a ligament?</p> <p>5 A When I was pregnant with my first child, a doctor</p> <p>6 explained the stretching of the ligament, but the</p> <p>7 pain I was referring to that night or that day to the</p> <p>8 nurse was something I was familiar with when -- in my</p> <p>9 other two births, when the baby started dropping</p> <p>10 right before labor.</p> <p>11 Q Okay. So when you arrived at Froedtert, you were</p> <p>12 experiencing pressure in your abdomen; correct?</p> <p>13 A Correct.</p> <p>14 Q The first written report of a description of what you</p> <p>15 were feeling is a Froedtert record that says you were</p> <p>16 experiencing tightening. Is that a fair description</p> <p>17 of what you were experiencing?</p> <p>18 A Yeah, the lower abdomen pressure, yeah, that's how I</p> <p>19 would explain it. Not like a contraction tightening,</p> <p>20 like pressure. Like everything getting tight down</p> <p>21 here. But not tightening like a contraction. The</p> <p>22 first time that they said something about the</p> <p>23 contractions was after they put the belly monitor on</p> <p>24 and explained to me that I was having contractions.</p> <p>25 Q So your testimony is you never used the word</p>

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<p>1 "contraction" until you were admitted to the labor 2 and delivery department at Froedtert and someone put 3 a monitor on you; correct? 4 A No, I said that was the first time she said it to me. 5 I don't recall seeing that I was having contractions. 6 Q You never believed you were having contractions prior 7 to being admitted to Froedtert and being in the labor 8 and delivery department; correct? 9 A I -- right now, sitting here today, yeah, that's what 10 I remember, feeling pressure. I didn't -- I don't 11 think I remember having contractions until she told 12 me I was having contractions, correct. 13 Q Sometimes a monitor can sense labor contractions and 14 the mother not feel those contractions? 15 A Okay. 16 Q Do you believe that's what was occurring while you 17 were on your way to labor -- to the labor and 18 delivery department at Froedtert? 19 MS. KLEINHAUS: Objection; foundation. 20 BY MR. KNOTT: 21 Q I just want to understand, you did not believe you 22 were having contractions until someone at Froedtert 23 informed you of that; right? 24 A I guess the way that I would answer that is, I didn't 25 disbelieve it. When she told me, I said: Oh, okay,</p>	<p>1 can we take another break? 2 MR. KNOTT: Yeah, I want to get through 3 this line of questioning. 4 MS. KLEINHAUS: Sure. 5 BY MR. KNOTT: 6 Q You did not believe you were in labor while you were 7 being transported to Froedtert; correct? 8 A I think the best way for me to answer this question 9 is in my definition of labor, that would -- that 10 would include the baby dropping to the point where 11 everything starts to begin. 12 So in my opinion, I felt that I was in the 13 beginning stages of the baby coming out of my body 14 and -- in the way of labor. 15 So as far as contractions, I don't -- I 16 don't recall if I thought I was having contractions. 17 I don't believe that I felt that way. I felt that 18 the baby was dropping and this was the beginning of 19 all of that. 20 Q I assume you didn't talk to the security staff that 21 was transporting you about your medical condition; 22 true? 23 A I'm sorry? 24 Q I assume you didn't talk to the medical -- to the 25 security staff who was transporting you to Froedtert</p>
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<p>1 it makes sense, because I felt like I was going into 2 labor. 3 Q And so you told the nursing staff at Froedtert that 4 you felt you were going into labor? 5 MS. KLEINHAUS: Objection, I think that 6 mischaracterizes the testimony, but go ahead. 7 THE WITNESS: I -- no, I didn't -- if I 8 made it sound like that's what I told them, I 9 misspoke, or that's what I was telling you right now. 10 What -- they told me that I was -- after doing 11 certain like tests, whatever, that yes, I was in the 12 early stages of labor; and it made sense to me 13 because that was how I felt as well, that I was going 14 into labor. 15 BY MR. KNOTT: 16 Q Let's back up. 17 Do you remember the booking nurse at the 18 Milwaukee County Jail? Do you remember what she 19 looked like? 20 A No. 21 Q Was it a nurse that you had ever seen before? 22 A I honestly don't know. I don't know. 23 Q Was it a nurse you ever saw after? 24 A I don't know. 25 MS. KLEINHAUS: When we get to a good spot,</p>	<p>1 about your medical condition? 2 A Absolutely not. 3 Q And it didn't change -- strike that. 4 Why would you not talk to the security 5 staff about your medical condition? 6 A That was transporting me to Froedtert already? 7 Q Yeah. 8 A Because in my experience, the transport people don't 9 talk to you. 10 Q Okay. And do you remember if you were transported by 11 ambulance? 12 A No, I was not. 13 Q What were you transported in? 14 A Two sheriff's deputies in a sheriff's vehicle, like a 15 car. 16 Q And they did not communicate with you at all during 17 that trip; correct? 18 A Not that I remember about medical, no. 19 Q And you do not communicate with them about that 20 during that trip; true? 21 A I don't remember communicating with them, no. 22 Q And do you remember, were you taken to the emergency 23 department at Froedtert? 24 A No, I believe I was taken right into like a labor and 25 delivery, like maternity area.</p>

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<p>1 Q Were you experiencing any symptoms of withdrawal on 2 your arrival at Froedtert? 3 A I remember being sleepy, but that was about it. 4 Q And you would have communicated truthfully and fully 5 with the nurses who came to take care of you at 6 Froedtert? 7 A I would have. 8 Q And at least initially you did not tell the nurses at 9 Froedtert that you were experiencing contractions 10 when you got there; true? 11 A No, I don't believe that's what I said to them. 12 MR. KNOTT: All right. We can take a 13 break, Tess. 14 MS. KLEINHAUS: Okay. 15 THE VIDEOGRAPHER: Going off the record at 16 3:11 p.m. 17 (Off the record.) 18 THE VIDEOGRAPHER: We're back on the record 19 at 3:30 p.m. 20 THE WITNESS: I just wanted to interrupt, 21 when I was outside taking a break, I thought of -- 22 it's kind of going back a little far, but when you 23 had asked me about different treatments that I had 24 since March 2014, I left one out. 25</p>	<p>1 MR. KNOTT: Which I don't think included 2 any drug treatment, true? 3 MS. KLEINHAUS: I don't know if it did or 4 not. 5 MR. KNOTT: You don't know that? 6 MS. KLEINHAUS: No, I don't know that. 7 BY MR. KNOTT: 8 Q Okay. So that was -- did you say September of 2015? 9 A I believe so, yes. 10 Q And what caused you to go to Arc in September of 11 2015? 12 A That was after the violations that I received for the 13 absconding from my probation officer that I had 14 mentioned and it was an alternative to revocation. I 15 told my probation officer when I was talking to him 16 about the allegations that I wanted to do treatment. 17 I just didn't know how to get myself into treatment, 18 and he -- he asked if he could help me get into 19 treatment, would I follow through. And I said yes, 20 and that's how I landed up there. 21 Q When you stop using heroin, in your experience, what 22 symptoms do you experience? 23 A When I'm going through the withdrawal? 24 Q Yes. Do you feel nausea? 25 A I do, I feel nausea, body aches, muscle aches. I get</p>
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<p>1 BY MR. KNOTT: 2 Q Do you recall what question it was that I asked that 3 you're going to amend your answer? 4 A I don't know. 5 Q What treatment you've had since March of 2014? 6 A Yes. 7 Q Okay. 8 A I would like to add an addition. I went to inpatient 9 treatment at a place called Arc for five months. 10 Q Okay. And when did you go to Arc? 11 A That would have been from September of 2015 to 12 February of 2016. 13 Q Spell "Arc." 14 A A-r-c. 15 Q Is that an acronym? 16 A I believe it is, but I don't know what it stands for. 17 Q And where is that located? 18 A It's off of 11th and Madison on the south side of 19 Milwaukee. It's through the Department of 20 Correction. 21 MR. KNOTT: And Ms. Kleinhaus, do we have 22 authorization for those records? 23 MS. KLEINHAUS: You have a -- the 24 agreed-upon authorization that we negotiated, so you 25 should.</p>	<p>1 a runny nose, sweats, hot and cold chills. 2 Q Vomiting? 3 A That -- yeah, that's -- yeah, I'm sorry, nausea and 4 vomiting. 5 Q Diarrhea? 6 A Yes. 7 Q And are those symptoms you experience each time 8 you're withdrawing from heroin? 9 A In my experience, yes. 10 Q And when you go through that experience, does it make 11 you feel anxiety? 12 A Yes. 13 Q And does it make you feel that you want to go find 14 more heroin? 15 A If -- to a point, yes. Yes, if I -- I mean, in my 16 experience, when I was using and I would go through 17 withdrawals, using on a daily basis and go through 18 withdrawals, that would be a driving force to get 19 heroin, yes. Other times when I would be committed 20 to quitting, I guess the thought doesn't enter my 21 head, but -- 22 Q When you're a heroin user and you're -- for some 23 reason not allowed to inject more heroin -- 24 A Uh-huh. 25 Q -- you feel anxiety?</p>

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<p>1 A Yes, sir.</p> <p>2 Q And is it anxiety unlike any other anxiety you have</p> <p>3 experienced in your lifetime?</p> <p>4 A I suppose, yes. I mean, all anxiety is a little bit</p> <p>5 different depending on the circumstances for me.</p> <p>6 Q Significant anxiety when you withdraw from heroin;</p> <p>7 right?</p> <p>8 A Yes.</p> <p>9 Q Do you think that a reasonable police officer would</p> <p>10 think that a heroin user, habitual heroin user that</p> <p>11 has been arrested, would want to escape custody in</p> <p>12 order to use more heroin? Is that a reasonable</p> <p>13 assumption in your mind?</p> <p>14 MS. KLEINHAUS: Just going to object --</p> <p>15 BY MR. KNOTT:</p> <p>16 Q As an experienced heroin user.</p> <p>17 MS. KLEINHAUS: Object -- excuse me, object</p> <p>18 to foundation. Go ahead.</p> <p>19 THE WITNESS: In my experience, when I have</p> <p>20 been arrested I would -- I mean, you know, honestly,</p> <p>21 I mean, in my experience, no. I mean, when it gets</p> <p>22 to that point, most seasoned officers, in my</p> <p>23 experience anyways, can recognize that a person</p> <p>24 really isn't in any shape to run away.</p> <p>25</p>	<p>1 things in order to obtain more heroin and use; true?</p> <p>2 MS. KLEINHAUS: Just object to form and</p> <p>3 foundation. You can answer.</p> <p>4 THE WITNESS: In my experience, yes, I have</p> <p>5 done different things to obtain heroin.</p> <p>6 BY MR. KNOTT:</p> <p>7 Q You yourself have broken the law in order to obtain</p> <p>8 more heroin?</p> <p>9 A Yes.</p> <p>10 Q You yourself in March 2014 moved to a motel in order</p> <p>11 to avoid arrest and to keep using heroin; right?</p> <p>12 MS. KLEINHAUS: Objection; form,</p> <p>13 mischaracterizes prior testimony. Go ahead.</p> <p>14 THE WITNESS: No, that's not -- that was</p> <p>15 not my intention for going to a hotel, was to</p> <p>16 continue using heroin.</p> <p>17 BY MR. KNOTT:</p> <p>18 Q When you went to Arc, were you experiencing</p> <p>19 withdrawals?</p> <p>20 A No.</p> <p>21 Q You had been in jail?</p> <p>22 A Yes.</p> <p>23 Q Did you describe to your counselors how you were</p> <p>24 feeling on a daily basis? Did you talk to them about</p> <p>25 your desire to use heroin and whether you were</p>
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<p>1 BY MR. KNOTT:</p> <p>2 Q So in your experience, what, you're physically unable</p> <p>3 to run away because you are arrested? I mean, what</p> <p>4 do you mean? I'm not talking about you in March of</p> <p>5 2014. I'm asking about a daily heroin user.</p> <p>6 A Okay.</p> <p>7 Q Isn't it reasonable that an officer should be</p> <p>8 suspicious, should be concerned that that daily</p> <p>9 heroin user would try to escape custody in order to</p> <p>10 continue to use heroin?</p> <p>11 MS. KLEINHAUS: Just object to foundation.</p> <p>12 Calls for speculation and incomplete hypothetical.</p> <p>13 But you can answer.</p> <p>14 THE WITNESS: My best answer to that is I'm</p> <p>15 not a police officer. I don't know what a police</p> <p>16 officer would think.</p> <p>17 BY MR. KNOTT:</p> <p>18 Q But you're an experienced heroin user and you know</p> <p>19 what it feels like to go without heroin after you</p> <p>20 have been using; right?</p> <p>21 A I do.</p> <p>22 Q And it creates a feeling like you want to have more</p> <p>23 heroin; right?</p> <p>24 A Correct.</p> <p>25 Q And somebody who is a daily heroin user will do many</p>	<p>1 overcoming that?</p> <p>2 A We had a daily check-in, what our feelings were, a</p> <p>3 few times a day, how we felt, whether it was in a</p> <p>4 using aspect or in a sobriety aspect, yes.</p> <p>5 Q And when you're in treatment, one of the things that</p> <p>6 you would discuss with a therapist is anxiety and a</p> <p>7 feeling like you don't want to use again; fair?</p> <p>8 A Fair.</p> <p>9 Q So now I want to go back to March 9 and to quickly</p> <p>10 kind of get up to where we are.</p> <p>11 A Okay.</p> <p>12 Q You had arrived at the Milwaukee County Jail and very</p> <p>13 promptly been assessed and approved for transport to</p> <p>14 Froedtert Hospital. Do you agree with that?</p> <p>15 A I do.</p> <p>16 Q It took a very short conversation with that nurse for</p> <p>17 you to be transported; correct?</p> <p>18 A Correct.</p> <p>19 Q Did she tell you that she was concerned that you had</p> <p>20 not had prenatal care?</p> <p>21 A I don't remember.</p> <p>22 Q Did you have any concern whatsoever for obtaining</p> <p>23 prenatal care when you are not in the jail?</p> <p>24 A When I was pregnant with Leland, no, that's -- I did</p> <p>25 but I didn't obtain prenatal care because of the</p>

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<p>1 using.</p> <p>2 Q So fair to say you felt guilty about not obtaining</p> <p>3 prenatal care?</p> <p>4 A Yes.</p> <p>5 Q And fair to say you felt anxiety about your child and</p> <p>6 the fact that you were not obtaining prenatal care?</p> <p>7 A Yeah, I think I answered that before. Yeah, yes.</p> <p>8 Q I think we talked about drug use but not lack of</p> <p>9 prenatal care.</p> <p>10 A Oh, okay.</p> <p>11 Q So I want to show you Exhibit 11. Have you reviewed</p> <p>12 any records to prepare for your deposition?</p> <p>13 A I'm sorry, can you say that one more time? I was</p> <p>14 reading. I'm sorry.</p> <p>15 Q Yeah, let me back up.</p> <p>16 Did you meet with your attorneys to prepare</p> <p>17 for your deposition?</p> <p>18 A Yes.</p> <p>19 Q How many times?</p> <p>20 A Once.</p> <p>21 Q Did you meet with anyone other than your attorneys to</p> <p>22 prepare for your deposition?</p> <p>23 A No.</p> <p>24 Q Did you watch any video to prepare for your</p> <p>25 deposition?</p>	<p>1 question, and I don't want to know what your attorney</p> <p>2 said to you, but are you saying that you did thumb</p> <p>3 through the interrogatory response?</p> <p>4 A Yes.</p> <p>5 Q And anything else that you thumbed through to get</p> <p>6 ready for the deposition?</p> <p>7 A No.</p> <p>8 Q Did you look at the complaint?</p> <p>9 A No. Or -- I'm sorry, no. I had to think about the</p> <p>10 difference.</p> <p>11 Q Okay. Do you remember whether there was any delay</p> <p>12 once you arrived at Froedtert and your being seen?</p> <p>13 A I don't remember, no.</p> <p>14 Q Do you remember any delay at the Milwaukee County</p> <p>15 Jail after the decision was made to transport you</p> <p>16 before you were transported?</p> <p>17 A I remember them waiting for deputies that could</p> <p>18 transport me. That was it.</p> <p>19 Q And are you in a position today to remember your</p> <p>20 conversations with -- with the nurses and doctors at</p> <p>21 Froedtert?</p> <p>22 MS. KLEINHAUS: Object to the form of the</p> <p>23 question, but go ahead.</p> <p>24 THE WITNESS: Not necessarily nurses and</p> <p>25 doctors. The woman I remember, I believe she was a</p>
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<p>1 A No.</p> <p>2 Q Did you review any records to prepare for your</p> <p>3 deposition?</p> <p>4 A No.</p> <p>5 Q Did you review any diagrams?</p> <p>6 A No.</p> <p>7 Q Did you review any deposition testimony?</p> <p>8 A No.</p> <p>9 Q Did you review your interrogatory responses?</p> <p>10 A Yeah, with the -- thumbed through -- I told her I had</p> <p>11 gone -- excuse me -- that I had also read through the</p> <p>12 initial ones the night before.</p> <p>13 MS. KLEINHAUS: None of his questions are</p> <p>14 intended to get at any conversation you had with me,</p> <p>15 so for any additional questions, you don't have to --</p> <p>16 just talk about what you reviewed, not any</p> <p>17 conversation.</p> <p>18 THE WITNESS: Okay.</p> <p>19 BY MR. KNOTT:</p> <p>20 Q Do you yourself have copies of the -- your medical</p> <p>21 records from March 2014 at home?</p> <p>22 A At home, no.</p> <p>23 Q At wherever you live?</p> <p>24 A No, I don't have records myself, no.</p> <p>25 Q Okay. So I'm trying to understand your prior</p>	<p>1 doctor, I remember her -- well, not even specifically</p> <p>2 talking to me, but she was explaining to the female</p> <p>3 deputy that was there about what they had found and</p> <p>4 what the plan of action was.</p> <p>5 BY MR. KNOTT:</p> <p>6 Q Okay. And you were not yet feeling the results --</p> <p>7 you were not yet feeling the symptoms of any</p> <p>8 withdrawal when you arrived; is that fair?</p> <p>9 A Yeah, that's fair. Like I said, I just remember</p> <p>10 being sleepy -- overly sleepy.</p> <p>11 Q Uh-huh. And are you testifying that the doctor never</p> <p>12 spoke to you while you were at Froedtert?</p> <p>13 A I'm -- I'm sure the doctor did speak and ask certain</p> <p>14 questions, but I remember the doctor speaking more so</p> <p>15 to the deputies than anything.</p> <p>16 Q What do you remember the doctor saying to -- I think</p> <p>17 you said the female deputy?</p> <p>18 A She explained to her that I was 80 percent effaced</p> <p>19 and 2 centimeters dilated. That my contractions --</p> <p>20 that I was having contractions, but they were too far</p> <p>21 apart. And that if I was on the street coming in on</p> <p>22 my own, that she would send somebody like that home</p> <p>23 until the labor had progressed farther.</p> <p>24 Q And you heard a doctor saying that to the female</p> <p>25 deputy; correct?</p>

<p style="text-align: right;">Page 118</p> <p>1 A Yes.</p> <p>2 Q And were you in the room?</p> <p>3 A The deputy was in the room -- in the room where I</p> <p>4 was -- I had been examined, yes, when the doctors --</p> <p>5 Q Were you in a room by yourself? I mean, was there</p> <p>6 only one patient in the room?</p> <p>7 A Yeah, it was just myself.</p> <p>8 Q And there wasn't -- it wasn't a curtained room, it</p> <p>9 was a four-walled room?</p> <p>10 A Yes, sir.</p> <p>11 Q And you were in a bed like we see in hospitals;</p> <p>12 right?</p> <p>13 A Yeah, like an OB bed.</p> <p>14 Q Which -- describe what you mean by "OB bed."</p> <p>15 A Where the stirrups come out by the feet and a woman</p> <p>16 has to put her feet in the stirrups.</p> <p>17 Q Were your feet in stirrups?</p> <p>18 A When she checked me, yes.</p> <p>19 Q And then your feet were taken out of stirrups?</p> <p>20 A Yes.</p> <p>21 Q And it was a female physician who check you; correct?</p> <p>22 A Excuse me? I'm sorry.</p> <p>23 Q It was a female physician who checked you; right?</p> <p>24 A Yes, sir.</p> <p>25 Q And how long before you left the hospital did you</p>	<p style="text-align: right;">Page 120</p> <p>1 MS. KLEINHAUS: Actually, do you mind if</p> <p>2 she just takes a minute to read that column and then</p> <p>3 you ask so she doesn't do two things at once?</p> <p>4 MR. KNOTT: Go ahead.</p> <p>5 THE WITNESS: (Witness complies.) Okay.</p> <p>6 BY MR. KNOTT:</p> <p>7 Q It says -- since you've read it, I will just read the</p> <p>8 part I want to ask you about. It says: Patient</p> <p>9 states, quote, I just need to get cleared and go to</p> <p>10 jail.</p> <p>11 A Uh-huh.</p> <p>12 Q End quote. Is that something that you said to a</p> <p>13 nurse at Froedtert?</p> <p>14 A I don't know if I said it to -- I said it to somebody</p> <p>15 at Froedtert, because I was asked "well, what are you</p> <p>16 here for today" type of question.</p> <p>17 Q And it says, quote: I think I felt the baby move</p> <p>18 twice in the last few hours.</p> <p>19 Is that something you said?</p> <p>20 A I don't -- I mean, that's what it says I said, but I</p> <p>21 don't remember saying that.</p> <p>22 Q It says, "I have tightenings in my belly sometimes</p> <p>23 but they aren't regular. They hurt, though. The</p> <p>24 patient reports tightening start today."</p> <p>25 Is that something you said?</p>
<p style="text-align: right;">Page 119</p> <p>1 hear that conversation?</p> <p>2 A I don't know the specific like time frame. I just</p> <p>3 remember by the time that I -- well, by the time --</p> <p>4 when I got to Froedtert it was maybe a little after</p> <p>5 dusk, and when we left Froedtert it was like</p> <p>6 nighttime.</p> <p>7 Q Okay. And is the answer that you don't remember how</p> <p>8 long before you were discharged that you heard that?</p> <p>9 A That's what I'm saying. I don't know hours wise, no.</p> <p>10 Q Did the doctor ever explain that -- what you</p> <p>11 overheard, did the doctor ever explain that directly</p> <p>12 to you?</p> <p>13 A No, I don't remember that being explained directly to</p> <p>14 me.</p> <p>15 Q What's the exhibit number that's in front of you</p> <p>16 there?</p> <p>17 A 11.</p> <p>18 Q I'm going to talk to you about this labor and</p> <p>19 delivery flow sheet. Tell me if you need more time</p> <p>20 to read, but I'm going to try to focus you on</p> <p>21 particular aspects of it.</p> <p>22 A Okay.</p> <p>23 Q I want to look at -- if you read the columns</p> <p>24 vertically, I want to talk to you about 2157. It</p> <p>25 says --</p>	<p style="text-align: right;">Page 121</p> <p>1 A Again, I don't remember saying that, but that's what</p> <p>2 it says I said.</p> <p>3 Q You don't dispute it; right?</p> <p>4 A Correct.</p> <p>5 Q At 2206 on the first page, it says you were sleeping</p> <p>6 through a contraction?</p> <p>7 A Uh-huh.</p> <p>8 Q Did you sleep much of the time that you were at</p> <p>9 Froedtert?</p> <p>10 A Like I said, I remember being extremely tired.</p> <p>11 Q And you believe you did fall asleep?</p> <p>12 A Yes.</p> <p>13 Q And any idea how long you were asleep?</p> <p>14 A No.</p> <p>15 Q And turning the page to 2214, it indicates, "Patient</p> <p>16 denies cramping, contracting, leaking of fluids, or</p> <p>17 bleeding."</p> <p>18 Are all of those true statements as of</p> <p>19 10:00 at night?</p> <p>20 A I don't know as of that time at night, but I believe</p> <p>21 that -- I remember I didn't -- I don't remember any</p> <p>22 of that happening up to that point, no, so that is</p> <p>23 believable.</p> <p>24 Q I'm not sure if you're contesting the record or not.</p> <p>25 Do you believe that you would have told</p>

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<p>1 somebody at 10:00 at night that you were cramping and 2 contracting? Do you dispute this record? 3 A I do not dispute it. 4 Q It says you report -- patient reports occasionally 5 tightening. Is that something you reported at 10:00 6 at Froedtert? 7 A I don't remember that, but I don't dispute it. 8 Q Dr. Dickerhoff, D-i-c-k-e-r-h-o-f-f. It looks like I 9 guess she is updated at 10:19. Do you know what type 10 of specialist Dr. Dickerhoff is? 11 A No, I do not. 12 Q There is a Dr. Wanless, W-a-n-l-e-s-s, referenced at 13 2239. Do you know that doctor? 14 A No, I don't. 15 Q Do you remember being encouraged to hydrate? 16 A No, I don't remember. 17 Q Turning the page to 2325. 18 MS. KLEINHAUS: Can you go to the next 19 page? 20 BY MR. KNOTT: 21 Q It says: The patient's sleeping in lateral position 22 upon entering room. I guess that's a nurse entering 23 the room. 24 By the way, do you remember Briana Barth, 25 RN?</p>	<p>1 then it says, "Patient reports pressure low in 2 abdomen." 3 Is that something you were reporting at 21 4 minutes after midnight? 5 A Again, I don't remember, but I don't dispute it. 6 Q And if you were reporting that you were experiencing 7 contractions, you would have told -- strike that. 8 If you were experiencing contractions, you 9 would have said that to a healthcare provider; true? 10 MS. KLEINHAUS: Objection; foundation. Go 11 ahead. 12 THE WITNESS: If I realized I was 13 experiencing contractions, yes, I would have 14 mentioned that. 15 BY MR. KNOTT: 16 Q And you were not experiencing contractions as of 21 17 minutes after -- after midnight on March 10; true? 18 MS. KLEINHAUS: Objection; foundation. You 19 can answer. 20 THE WITNESS: I -- I honestly don't know. 21 BY MR. KNOTT: 22 Q And there is a report of a vaginal exam at 28 minutes 23 after midnight by Dr. Dickerhoff and it reports the 24 data that you quoted earlier. 25 Do you remember whether you -- that changed</p>
Page 123	Page 125
<p>1 A I do not. 2 Q Did she seem to you to be -- I mean, do you remember 3 the nurses you interacted with? 4 A No, I don't. 5 Q In general, do you think that the nursing staff in 6 the labor and delivery department at Froedtert was 7 caring and concerned about your condition? 8 A Yes. 9 Q Do you -- 10 A One of them, yeah. Go ahead. 11 Q Do you think they treated you differently than any 12 other patient? 13 A No. 14 Q Do you remember getting an ultrasound? 15 A Vaguely, I guess. 16 Q And do you remember why you got an ultrasound? 17 A No, I don't. 18 Q Turn the page to the column that shows 2341. 19 It says that the fetal heart tone 20 monitoring strip was reviewed by Dr. Wanless and Dr. 21 Dickerhoff. Do you remember two doctors reviewing a 22 strip? 23 A No. 24 Q Moving forward to now 21 minutes after midnight. It 25 says that there was some blood drawn, I believe, and</p>	<p>1 at all? Do you remember whether your -- strike that. 2 You know what dilatation is? 3 A No, I don't. 4 Q You know what effacement is? 5 A Oh, I'm sorry, the way you said it. Dilation, yes, I 6 do know what both of those are. 7 Q And do you know if that changed at all during the 8 time that you were at Froedtert? 9 A I do not know if that changed. I just remember those 10 specific statistics given and then somebody saying 11 that I could walk around a week like that or it could 12 progress very fastly -- or very quickly. 13 Q And that was a doctor? 14 A I believe it was a doctor, yes. 15 Q And that doctor never said that directly to you, but 16 said it to a deputy; correct? 17 A That's what I believe, yes. 18 Q And turning to the page that has "312" at the bottom, 19 at 30 minutes after. 20 A I'm sorry, can you repeat that number one more time? 21 Q I'm sorry? 22 A Can you repeat that number one more time? What page 23 is it. 24 Q I'm looking at 30 minutes after on March 10. I gave 25 you the number that's at the bottom of the page too,</p>

<p style="text-align: right;">Page 126</p> <p>1 which is also --</p> <p>2 A Okay, I got it.</p> <p>3 Q Which is also page 312.</p> <p>4 A I got it.</p> <p>5 Q So to be clear, we're talking about an entry at 30 minutes after midnight?</p> <p>6 A Uh-huh.</p> <p>8 Q It says, "Due date verified based on Wheaton eight week ultrasound." Do you remember having an ultrasound at Wheaton Franciscan Hospital at eight weeks?</p> <p>12 A No. Well, I didn't remember that it was at Wheaton; but I do remember that's how I discovered my due date, that I was having an ultrasound at a hospital.</p> <p>15 Q And you went to get that ultrasound after you were arrested; correct?</p> <p>17 A I don't remember.</p> <p>18 Q You didn't go on your own to get an ultrasound, did you?</p> <p>20 A Yes, I did go on my own to get an ultrasound while I was pregnant.</p> <p>22 Q With -- with -- in 2013, 2014?</p> <p>23 A Yes, but I -- I believed it was at St. Luke's South Shore. I didn't go there for the specific purpose of getting an ultrasound. I went there stating I</p>	<p style="text-align: right;">Page 128</p> <p>1 date was March 18?</p> <p>2 A Not that I remember.</p> <p>3 Q At 34 minutes after the hour, there is an entry, "Strip reviewed and patient okay for discharge to jail." Correct?</p> <p>5 A Yes.</p> <p>7 Q And do you remember a doctor talking to you at that time and telling you that you were stable for discharge to the jail?</p> <p>10 A No, that's actually what I meant before -- right before I left, they spoke to the deputy and explained all that to the deputy.</p> <p>13 Q Do you think it was improper that the physician spoke to the deputy but not you?</p> <p>15 A No, I think I would have granted permission.</p> <p>16 Q At the last page, at 50 minutes after the hour, it says, "Patient continues to feel mild tightening."</p> <p>18 MS. KLEINHAUS: I'm sorry, where?</p> <p>19 MR. KNOTT: On page 313.</p> <p>20 MS. KLEINHAUS: I'm sorry. Go ahead.</p> <p>21 BY MR. KNOTT:</p> <p>22 Q "Patient continues to feel mild tightening." Do you think that's an accurate description of what you're perceiving at that time?</p> <p>25 A I don't remember.</p>
<p style="text-align: right;">Page 127</p> <p>1 thought I might be pregnant, and I hadn't had my period in such a -- you know, whatever time, and they did an ultrasound, and at that time they gave me the due date.</p> <p>5 Q And so there would be records pertaining to this pregnancy at you think --</p> <p>7 A St. Luke's South Shore.</p> <p>8 Q St. Luke's South Shore, and you have memory going to that hospital in order to get assessed and it resulted in an ultrasound; true?</p> <p>11 A True.</p> <p>12 Q And it says that the due date was March 18. Do you see that?</p> <p>14 A Uh-huh.</p> <p>15 Q "Yes"?</p> <p>16 A I do see that, yes.</p> <p>17 Q And was that the due date that you were told at the hospital in -- when you had that ultrasound?</p> <p>19 A The one that I was -- the one that I was speaking of at St. Luke's South Shore.</p> <p>21 Q Yeah.</p> <p>22 A I was told March 10th.</p> <p>23 Q Any idea why this would report March 18?</p> <p>24 A I have no idea.</p> <p>25 Q Did you ever hear from anybody else that your due</p>	<p style="text-align: right;">Page 129</p> <p>1 Q Do you think it's possible that your perception of pain from labor was dulled at all by the fact that you were using -- a heroin user?</p> <p>4 A I -- at this point, no. The fact of when I -- excuse me -- used last in comparison to what we're reading, I don't think so, no.</p> <p>7 Q Meaning that you had used heroin long -- at a long enough period before 50 minutes after the hour that you don't think that heroin would have dulled any pain at that time?</p> <p>11 A Correct. At 24 -- I mean, that's at least 24 hours after the last time I used.</p> <p>13 Q And it says, "discussed round ligament pain with patient and encouraged patient to stay well hydrated."</p> <p>16 Do you remember having that conversation with an RN?</p> <p>18 A No. I mean, it sounds vaguely familiar; but, no, I don't remember specifically.</p> <p>20 Q What do you think was meant by "round ligament pain"?</p> <p>21 Do you have any understanding what that refers to?</p> <p>22 A From previous experience, I would think from the stretching of the ligaments.</p> <p>24 Q Was the nurse telling you at 50 minutes after the hour that you were not experiencing labor, but you</p>

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<p>1 were experiencing pain in the round ligament from 2 expansion of your pelvis as you got ready for birth? 3 MS. KLEINHAUS: Objection. Go ahead. 4 Sorry. 5 BY MR. KNOTT: 6 Q Is that what she was explaining to me? 7 MS. KLEINHAUS: Objection to form, 8 foundation. Go ahead. 9 THE WITNESS: I don't -- I honestly don't 10 know. 11 BY MR. KNOTT: 12 Q And it says -- 1:01 a.m., it says, "Printed discharge 13 instructions and provided copy to patient." 14 Do you remember given -- being given 15 papers? 16 A No. 17 Q Do you dispute that printed discharge instructions 18 were provided to you? 19 A No, I just don't remember being given papers. 20 Q In your experience, when you are transported from a 21 jail to a hospital for care, are you allowed to keep 22 the papers when you return to the jail? 23 MS. KLEINHAUS: Objection; foundation. Go 24 ahead. 25 THE WITNESS: I -- I don't know if you're</p>	<p>1 any concerns; true? 2 MS. KLEINHAUS: Objection to form and 3 foundation. 4 BY MR. KNOTT: 5 Q That's what you just testified to. 6 MS. KLEINHAUS: Go ahead. In that case, 7 asked and answered. 8 THE WITNESS: Right, I don't -- right, but 9 I'm saying I'm not -- I'm not saying that I didn't 10 say that, but I'm saying, there wasn't much more to 11 be concerned about at that point. I'm getting 12 cleared to go to jail, I'm in the beginning stages of 13 labor, they are going to send me -- like I said, my 14 understanding was even if I came in off the street in 15 the same -- at the same very time, they would have 16 sent me away to watch the progression of labor, so 17 there was no more concern. It is what it is. 18 BY MR. KNOTT: 19 Q Is that what the doctors told you? 20 A That's what I overheard the doctor telling the 21 deputy. 22 Q And describe the female deputy that overheard that. 23 A I know specifically that deputy, actually. 24 Q Who was that? 25 A Deputy Armstrong.</p>
Page 131	Page 133
<p>1 allowed to keep papers from a hospital or not. 2 BY MR. KNOTT: 3 Q Do you remember -- strike that. 4 Do you remember anybody asking you for 5 discharge instructions once you returned to the jail? 6 A No. No. 7 Q And at 1:02, the last entry by the RN, it says, 8 "Patient provided with time to ask questions and 9 denies further concerns." Is that a true statement? 10 A I don't remember specifically that, no, but it -- I'm 11 not disputing that, no. 12 Q So at the time you were discharged from Froedtert, 13 you were comfortable that you had been seen by 14 qualified medical professionals; true? 15 A True. 16 Q And you trusted their assessment; true? 17 A True. 18 Q And they had told you that you are not in labor at 19 that time; correct? 20 MS. KLEINHAUS: Objection to form, 21 foundation. You can answer. 22 THE WITNESS: My understanding was that I 23 was in the beginning stages of labor. 24 BY MR. KNOTT: 25 Q But when you spoke to Nurse Barth, you didn't have</p>	<p>1 Q Say it again. 2 A Deputy Armstrong. 3 Q How do you know Deputy Armstrong? 4 A From being in another Milwaukee County Jail. 5 Q And on what other occasions had you interacted with 6 Deputy Armstrong? 7 A Just being in and out of jail, I knew who she was. 8 Q Are you saying that you had a problem with Deputy 9 Armstrong previously? 10 A No, never. 11 Q Was she -- 12 A I might have seen her in passing or she may have been 13 a CO in a pod that I was in. 14 Q Did she ever treat with you with disrespect? 15 A Never. 16 Q Did she seem like a kind and concerned person towards 17 you? 18 A Yes. She seemed like somebody who was doing her job. 19 Q And do you have any reason to believe that she didn't 20 do her job on March 9th or 10th? 21 A No, I -- I never -- no, I wouldn't think that of her, 22 no. 23 Q The nurses and physicians at Froedtert were given 24 time and an opportunity to do a complete exam? 25 A Uh-huh.</p>

<p style="text-align: right;">Page 134</p> <p>1 Q "Yes"?</p> <p>2 A Yes.</p> <p>3 Q You were not in physical pain other than the pain in</p> <p>4 your abdomen while at Froedtert; true?</p> <p>5 A True.</p> <p>6 Q And I have -- I'm looking at Exhibit 10. I put a</p> <p>7 copy in front of you. It's a discharge summary.</p> <p>8 MS. KLEINHAUS: Go ahead and review it.</p> <p>9 BY MR. KNOTT:</p> <p>10 Q Yeah.</p> <p>11 A I'm good, go ahead.</p> <p>12 Q Have you seen this document before?</p> <p>13 A It doesn't look familiar.</p> <p>14 Q It says in the main paragraph, there, above prenatal</p> <p>15 course --</p> <p>16 A Uh-huh.</p> <p>17 Q -- she had been experiencing intermittent abdominal</p> <p>18 cramping since this morning.</p> <p>19 Is that something you told the physicians</p> <p>20 at Froedtert?</p> <p>21 A Again, I don't remember saying that.</p> <p>22 Q It's really inconsistent with what you have told us</p> <p>23 here today, isn't it?</p> <p>24 MS. KLEINHAUS: Objection to form.</p> <p>25 THE WITNESS: Yeah.</p>	<p style="text-align: right;">Page 136</p> <p>1 Does this refresh your recollection that</p> <p>2 you had, in fact, used cocaine prior to being</p> <p>3 arrested?</p> <p>4 MS. KLEINHAUS: Objection to form. Go</p> <p>5 ahead.</p> <p>6 THE WITNESS: I said that I had earlier</p> <p>7 that day.</p> <p>8 BY MR. KNOTT:</p> <p>9 Q Okay. All right. I probably misheard you.</p> <p>10 Your discharge condition is stable;</p> <p>11 correct? That's what it says?</p> <p>12 A Oh, yes.</p> <p>13 Q And it says, "Will get prenatal care through the</p> <p>14 jail."</p> <p>15 Did you speak with the guards during your</p> <p>16 transport from Froedtert back to the jail?</p> <p>17 A I don't remember speaking with them, no.</p> <p>18 Q Did the female officer explain to you what she had</p> <p>19 heard?</p> <p>20 A No, not that I remember.</p> <p>21 Q Did she describe for you a plan for what would happen</p> <p>22 with you?</p> <p>23 A Not that I remember.</p> <p>24 Q Tell me what you remember about your arrival at the</p> <p>25 Milwaukee County Jail for the second time.</p>
<p style="text-align: right;">Page 135</p> <p>1 MS. KLEINHAUS: Sorry.</p> <p>2 THE WITNESS: That's all right. Like I</p> <p>3 said, what I remember today is feeling pressure when</p> <p>4 I -- shortly after I got to jail. If this is what I</p> <p>5 said or felt, then --</p> <p>6 BY MR. KNOTT:</p> <p>7 Q Did your experience of that pressure change at all</p> <p>8 during your time at Froedtert?</p> <p>9 A I don't remember it changing, no, as far as</p> <p>10 increasing or decreasing.</p> <p>11 Q And you would still describe it as that same sort of</p> <p>12 pressure lower in your abdomen at the time of</p> <p>13 discharge; true?</p> <p>14 A Yes.</p> <p>15 Q And it says "prenatal course." It says, "dated by</p> <p>16 eight week ultrasound at St. Joseph's." Does that</p> <p>17 refresh your recollection as to where you would have</p> <p>18 obtained an ultrasound?</p> <p>19 A No. But perhaps it was St. Joseph's and not St.</p> <p>20 Luke's, I'm not sure, but that's where I thought I</p> <p>21 had it was St. Luke's.</p> <p>22 Q It says: OB panel, which I believe is a lab. It's</p> <p>23 preliminary. It has some findings. It say: Urine</p> <p>24 drug panel positive for cocaine, marijuana, and</p> <p>25 opiates.</p>	<p style="text-align: right;">Page 137</p> <p>1 A I remember -- I don't remember going through booking,</p> <p>2 like taking the picture and all that. I remember</p> <p>3 getting my bracelet and I remember being taken back,</p> <p>4 what felt quickly. It felt like I had gone through</p> <p>5 pretty quickly after the -- getting back to the jail,</p> <p>6 going -- when I say going through to the area past</p> <p>7 booking to where a CO gives like a bed roll, so</p> <p>8 sheets and blanket. The CO, I remember I was sitting</p> <p>9 on a concrete bench, and she was looking for</p> <p>10 blanket -- or a blanket because what was there was</p> <p>11 just sheets. The blankets weren't there, whatever.</p> <p>12 And I remember saying to her something to</p> <p>13 the effect like: Oh, this hurts. And she said: Oh,</p> <p>14 it gets way worse. I said: Oh, no, I'm going to</p> <p>15 have this baby pretty quick. It's not like this is</p> <p>16 just normal growing pains kind of thing. She seemed</p> <p>17 to dive too deep into the conversation with me about</p> <p>18 it. And then she start -- she told me to follow her,</p> <p>19 and shortly after that is when we arrived at the SMU</p> <p>20 Unit, which I was actually, I remember, feeling</p> <p>21 extremely relieved.</p> <p>22 Q Okay. Let me break that down.</p> <p>23 A Okay.</p> <p>24 Q So you arrive back at the jail with two guards;</p> <p>25 correct?</p>

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<p>1 A Uh-huh.</p> <p>2 Q "Yes"?</p> <p>3 A Yes.</p> <p>4 Q And when you left Froedtert, were you able to walk</p> <p>5 out of Froedtert?</p> <p>6 A I did walk, yes.</p> <p>7 Q And do you know what I mean when I say the phrase</p> <p>8 "active labor"? Do you know what that means?</p> <p>9 A In my opinion, it's the beginning of childbirth.</p> <p>10 Q It's experiencing contractions?</p> <p>11 A Okay.</p> <p>12 Q If you accept that as the definition, do you agree</p> <p>13 that you were not in active labor, experiencing</p> <p>14 contractions, as of the time you were transported</p> <p>15 from Froedtert back to Milwaukee County Jail?</p> <p>16 MS. KLEINHAUS: Objection as to foundation</p> <p>17 and form, but go ahead.</p> <p>18 BY MR. KNOTT:</p> <p>19 Q Let me take the medical term out of it. Were you</p> <p>20 experiencing contractions as of the time you were</p> <p>21 transported from the hospital back to the jail?</p> <p>22 A I just remember feeling sore.</p> <p>23 Q Okay. And it was a persistent soreness, but not a --</p> <p>24 something that came and went like contractions; fair?</p> <p>25 A I don't remember. At that point I don't remember. I</p>	<p>1 card.</p> <p>2 MR. KNOTT: Sure.</p> <p>3 THE VIDEOGRAPHER: Go off the record at</p> <p>4 4:17 p.m.</p> <p>5 (Off the record.)</p> <p>6 THE VIDEOGRAPHER: We're back on the record</p> <p>7 at 4:27 p.m.</p> <p>8 BY MR. KNOTT:</p> <p>9 Q Ms. Terry, your oldest son is Jeremiah; right?</p> <p>10 A Correct.</p> <p>11 Q Do you remember how long you were in labor with</p> <p>12 Jeremiah?</p> <p>13 A I don't remember how long specifically I was in</p> <p>14 labor. I remember only how long before I was given</p> <p>15 pain medicine.</p> <p>16 Q And what does that mean?</p> <p>17 A I was in -- I was trying not to take pain medicine</p> <p>18 when I gave birth to either one of my children,</p> <p>19 Dayton or Jeremiah. I didn't have pain medicine for</p> <p>20 38 hours with Jeremiah, and then I had him shortly</p> <p>21 after that, so I'm not sure the exact hours how long.</p> <p>22 Q And do you know how the size of -- do you know the</p> <p>23 size of your children?</p> <p>24 A When they were born?</p> <p>25 Q Their birth weights.</p>
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<p>1 just -- I remember it was strong enough to where I</p> <p>2 said something to somebody else, which is not like</p> <p>3 me. Because when I stated it to the guard that was</p> <p>4 giving the bed roll, it wasn't because I thought she</p> <p>5 was going to do something about it, I was making</p> <p>6 conversation. So for it to be strong enough --</p> <p>7 Q Could I --</p> <p>8 A I'm sorry.</p> <p>9 Q I'm sorry.</p> <p>10 A No, go ahead.</p> <p>11 Q I think you're getting ahead in time. I'm going to</p> <p>12 give you an opportunity to talk about that.</p> <p>13 A Okay.</p> <p>14 Q I want to talk about the guards took you back to</p> <p>15 booking; correct?</p> <p>16 A I remember coming in the sallyport. And that's what</p> <p>17 I'm saying, I don't remember going through the</p> <p>18 booking process after that. Like I -- and maybe my</p> <p>19 memory is wrong, but it's like I remember skipping</p> <p>20 through all of that.</p> <p>21 Q Do you have --</p> <p>22 A So obviously -- maybe I missed that part in my</p> <p>23 memory, because usually that part takes a long time.</p> <p>24 THE VIDEOGRAPHER: Excuse me, counsel, can</p> <p>25 we go off the record? I need to change my media</p>	<p>1 A Right. I remember, Jeremiah I believe was 21 inches</p> <p>2 long and a little over 9 pounds. And then for</p> <p>3 Dayton, I believe it was 20 inches long and I want to</p> <p>4 say somewhere around 7 pounds. I'm not sure exactly.</p> <p>5 Q And do you remember how long you were in labor with</p> <p>6 Dayton?</p> <p>7 A Again, I just remember that I waited almost 26 hours</p> <p>8 before I got pain medication and then a few hours</p> <p>9 after that I had him, or a couple.</p> <p>10 Q And you did not want to take pain medication during</p> <p>11 the delivery of either child; is that what you said?</p> <p>12 A I was attempting not to, yes.</p> <p>13 Q But you ended up taking medication in both those</p> <p>14 instances; correct?</p> <p>15 A Correct.</p> <p>16 Q And you were able to deliver; right?</p> <p>17 A Yes, both.</p> <p>18 Q And that didn't trigger a relapse or anything?</p> <p>19 MS. KLEINHAUS: Objection to form,</p> <p>20 foundation. Go ahead.</p> <p>21 BY MR. KNOTT:</p> <p>22 Q Yeah, I assume that you didn't want to take pain</p> <p>23 medication because of a concern about prior</p> <p>24 addiction, is that true?</p> <p>25 A When I had Jeremiah, I hadn't used drugs like that.</p>

<p style="text-align: right;">Page 142</p> <p>1 When I had Dayton -- for both -- no, that's -- the</p> <p>2 answer is no, that's not true, that's not why. I --</p> <p>3 the doctor told me that using pain medication could</p> <p>4 have certain side effects on the babies, so that's</p> <p>5 why I tried not to.</p> <p>6 Q And where did you deliver Jeremiah?</p> <p>7 A It was an Aurora Hospital in Kenosha. I forget what</p> <p>8 the name of it is.</p> <p>9 Q Did you live in Kenosha at the time?</p> <p>10 A I lived in Caledonia.</p> <p>11 Q And where did you deliver Dayton?</p> <p>12 A At the Women's Center Hospital in West Allis. I</p> <p>13 forget what it's called.</p> <p>14 Q Is that West Allis Memorial?</p> <p>15 A I believe so.</p> <p>16 Q And what OBs delivered Jeremiah?</p> <p>17 A Jeremiah was Dr. Drake, and I don't remember the</p> <p>18 doctor's name for Dayton.</p> <p>19 Q But the doctor who delivered Dayton had told you that</p> <p>20 use of pain medication during labor can have an</p> <p>21 impact on the child?</p> <p>22 A That's what the doctor who delivered Jeremiah said,</p> <p>23 and I just stuck with that advice with the delivery</p> <p>24 of Dayton as well.</p> <p>25 Q And did you have -- strike that.</p>	<p style="text-align: right;">Page 144</p> <p>1 MS. KLEINHAUS: Objection; form,</p> <p>2 foundation. Go ahead.</p> <p>3 THE WITNESS: I mean, that's what's</p> <p>4 happened every time I have gone to jail before, so</p> <p>5 that's why I'm like I don't know why I don't remember</p> <p>6 that part, because obviously my bracelet had my</p> <p>7 picture on it -- my picture, excuse me.</p> <p>8 BY MR. KNOTT:</p> <p>9 Q So do you think it's in any way related to your use</p> <p>10 of drugs that you don't have a recollection of that</p> <p>11 occurring?</p> <p>12 A I believe that it was just a long couple days at that</p> <p>13 point.</p> <p>14 Q And do you remember the nurse that you spoke to when</p> <p>15 you returned from Froedtert?</p> <p>16 A No.</p> <p>17 Q Anything about that conversation that you can recall</p> <p>18 for us?</p> <p>19 A I don't remember.</p> <p>20 Q You don't remember anything you said to her or</p> <p>21 anything she said to you?</p> <p>22 A I don't remember talking to the nurse at all, so</p> <p>23 neither.</p> <p>24 Q So is it fair to say your recollection is somehow</p> <p>25 coming through the sallyport and then the next</p>
<p style="text-align: right;">Page 143</p> <p>1 Do you know what an episiotomy is?</p> <p>2 A I do.</p> <p>3 Q Did you have an episiotomy with either Jeremiah or</p> <p>4 Dayton?</p> <p>5 A I did.</p> <p>6 Q One or both?</p> <p>7 A Both.</p> <p>8 Q Any other -- I can't remember what the term is. Any</p> <p>9 other tools used to assist in the delivery, like</p> <p>10 vacuum?</p> <p>11 A No.</p> <p>12 Q For either?</p> <p>13 A No. No, sir.</p> <p>14 Q And we were kind of walking through the process of</p> <p>15 your return to the jail, and you don't have a memory</p> <p>16 of or do you have a memory of coming through the</p> <p>17 sallyport?</p> <p>18 A I do remember coming in through the sallyport. And</p> <p>19 then -- yeah, and then the next part that I remember</p> <p>20 is getting my bracelet put on and being walked to the</p> <p>21 area where you were given the bed roll. I don't</p> <p>22 remember the booking process.</p> <p>23 Q But you know that during that process, after your</p> <p>24 return from Froedtert, you would have been</p> <p>25 fingerprinted and your blood taken?</p>	<p style="text-align: right;">Page 145</p> <p>1 recollection is on your way to the infirmary?</p> <p>2 A Yes.</p> <p>3 Q And if the record would reflect -- if the record were</p> <p>4 to reflect that your vitals were taken on your return</p> <p>5 from Froedtert, would you have a reason to dispute</p> <p>6 that?</p> <p>7 A No, that sounds reasonable.</p> <p>8 Q Now, you referenced a CO that was looking for a</p> <p>9 blanket, and you had a conversation with him or her.</p> <p>10 I think it was --</p> <p>11 A Her.</p> <p>12 Q -- a her.</p> <p>13 A Uh-huh.</p> <p>14 Q And where was that conversation?</p> <p>15 A That was right outside of the booking area. I mean,</p> <p>16 it's kind of hard to describe the jail, but it's</p> <p>17 right by where the general transport office is and</p> <p>18 they lined up bed rolls and then there is a shower</p> <p>19 area where they have inmate shower and -- before they</p> <p>20 head to different units or pods.</p> <p>21 Q And did that CO assist in transporting you --</p> <p>22 transferring you to the SMU, the special medical</p> <p>23 unit?</p> <p>24 A That was the same.</p> <p>25 Q That was the same person?</p>

<p style="text-align: right;">Page 146</p> <p>1 A Yes, sir.</p> <p>2 Q And why was she looking for a blanket?</p> <p>3 A Because there wasn't one there. There was only two sheets stacked together. I don't know if there</p> <p>4 wasn't any clean or any clean available.</p> <p>5 Q So the -- she was looking for blankets in the booking</p> <p>6 area?</p> <p>7 A In the -- right before the shower area, where the blankets and all the laundry for the bed rolls are.</p> <p>8 Q This was before starting the process of going to the</p> <p>9 SMU?</p> <p>10 A Yes, sir.</p> <p>11 Q And tell me what you recall about that conversation.</p> <p>12 A I just remember sitting there and just making</p> <p>13 smalltalk with her, telling her like: Oh, this</p> <p>14 really hurts. And she -- she responded like: Oh,</p> <p>15 girl, it's going to get way worse. And I was like:</p> <p>16 Oh, I've had two kids before, I understand. I said:</p> <p>17 But, you know, this is the beginning of it all kind</p> <p>18 of thing. This is where it all -- you know.</p> <p>19 Explaining to her I knew I was in the</p> <p>20 beginning parts of labor. And she just kind of,</p> <p>21 okay, you know, and didn't really say too much after</p> <p>22 that, and told me to follow her.</p> <p>23 And then we got -- like I said, we got to</p>	<p style="text-align: right;">Page 148</p> <p>1 something, you know, with the salt and pepper hair as</p> <p>2 much as -- she had white hair mixed in there.</p> <p>3 Q And did you observe that person speaking to anyone</p> <p>4 about you?</p> <p>5 A The only person was the CO in the SMU when they</p> <p>6 closed the doors -- or when she closed the door</p> <p>7 behind me, I saw her give my card to the CO that was</p> <p>8 there, and I assume -- I mean, she stood there for a</p> <p>9 second. I assumed they were talking about something.</p> <p>10 I don't know what.</p> <p>11 Q Did you say anything to the CO in the SMU on your way</p> <p>12 into your cell?</p> <p>13 A No.</p> <p>14 Q Had you ever seen that CO before?</p> <p>15 A No.</p> <p>16 Q Did you ever see him after?</p> <p>17 A Yes.</p> <p>18 Q And where did you see him?</p> <p>19 MS. KLEINHAUS: Objection to form. Go</p> <p>20 ahead.</p> <p>21 THE WITNESS: I saw him when I was at --</p> <p>22 receiving treatment at UCC. I'm trying to think.</p> <p>23 There was this last -- maybe September, so 2017,</p> <p>24 because I had gone to the jail to retrieve my phone</p> <p>25 that was in property from a -- I went to jail</p>
<p style="text-align: right;">Page 147</p> <p>1 the SMU right before. My last interaction with her</p> <p>2 was her telling me that she would try to bring me a</p> <p>3 blanket before the end of her shift, before she put</p> <p>4 me in the cell.</p> <p>5 Q Can you describe that CO?</p> <p>6 A She was --</p> <p>7 Q Was she an officer?</p> <p>8 A Yes, sir, with a gray uniform.</p> <p>9 Q Okay. Which is different than the regular CO;</p> <p>10 correct? You understood that person to be an</p> <p>11 officer; correct?</p> <p>12 A A sheriff's deputy, yes.</p> <p>13 Q Okay.</p> <p>14 A Well, I've seen her in the jail before, so -- I don't</p> <p>15 see them as different. I don't know if they are</p> <p>16 different. I thought they were all the same.</p> <p>17 Q Okay. Fair enough. Can you describe her?</p> <p>18 A She is a little bit shorter than me, black woman,</p> <p>19 glasses -- they are black-rimmed glasses. She had</p> <p>20 short hair, kind of salt and pepper colored.</p> <p>21 Q Approximately --</p> <p>22 A And maybe a little bit heavier.</p> <p>23 Q Approximate age?</p> <p>24 A I'm really not that great with guessing ages. I</p> <p>25 would guess a little bit older, maybe 50s or late 40s</p>	<p style="text-align: right;">Page 149</p> <p>1 overnight and my property -- and my phone was left in</p> <p>2 property, so I went there, I pressed the elevator</p> <p>3 button and it opened, and the same CO was standing</p> <p>4 there, and I just skipped the elevator, but that was</p> <p>5 the only other time I saw him.</p> <p>6 BY MR. KNOTT:</p> <p>7 Q Okay. So you saw him at the jail?</p> <p>8 A Yes.</p> <p>9 Q And he didn't say anything to you?</p> <p>10 A No.</p> <p>11 Q You had no idea what was on the card that was handed</p> <p>12 to that CO; correct?</p> <p>13 A I just know that it was my -- I don't know what they</p> <p>14 call it. It's for the inmates, like any time they go</p> <p>15 anywhere in the jail, there is a card with the</p> <p>16 inmate's picture on it, and from what I have been</p> <p>17 told, it just documents your movement around the</p> <p>18 jail.</p> <p>19 Q And how long after -- do you know how long after you</p> <p>20 arrived at the jail from Froedtert you were taken to</p> <p>21 the SMU?</p> <p>22 A I don't know.</p> <p>23 Q And as of the time of your arrival at the special</p> <p>24 medical unit, had your experience that you described</p> <p>25 at Froedtert changed in any way? The pain you were</p>

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<p>1 experiencing.</p> <p>2 A From the time that I left Froedtert until the time</p> <p>3 that I got to SMU had it changed? Is that what</p> <p>4 you asked? I'm sorry.</p> <p>5 Q Yes.</p> <p>6 A Not that I remember at that point, no. It just was</p> <p>7 the same feeling.</p> <p>8 Q It was the same feeling that you had at the time of</p> <p>9 your discharge from Froedtert?</p> <p>10 A Yes.</p> <p>11 Q When you arrived at the special medical unit, did you</p> <p>12 note whether there were other inmates in the unit?</p> <p>13 A At that time they -- there was no inmates outside of</p> <p>14 their cells, no.</p> <p>15 Q Did you see any inside the cells?</p> <p>16 A No, your -- no.</p> <p>17 Q Were they sleeping?</p> <p>18 A I would assume so.</p> <p>19 Q But --</p> <p>20 A At the same time when you're at the jail, you're not</p> <p>21 allowed to -- you're not really supposed to look out</p> <p>22 your window.</p> <p>23 Q Do you know the names of any inmates who were in the</p> <p>24 SMU that night?</p> <p>25 A I know a nickname of one of them because that was</p>	<p>1 Q And were you able to sleep after you arrived in the</p> <p>2 SMU?</p> <p>3 A No.</p> <p>4 Q At some point in time, while you were in the SMU,</p> <p>5 there was a change in your experience of symptoms;</p> <p>6 fair?</p> <p>7 A Correct. Fair.</p> <p>8 Q And how long was that after your arrival in the SMU?</p> <p>9 A I couldn't tell you an exact time. It was a</p> <p>10 progressive change.</p> <p>11 Q So it wasn't a sudden change, it was something that</p> <p>12 came on over a period of time?</p> <p>13 A Correct.</p> <p>14 Q Was it hours?</p> <p>15 A I don't know. I mean, the way -- even when I don't</p> <p>16 have a clock up, until this point, everything we</p> <p>17 talked about I would judge by how it was outside or</p> <p>18 what a guard told me. Like when the officer from</p> <p>19 Franklin was taking me, it was around lunchtime, or</p> <p>20 when I got to Froedtert it was sometime after dusk or</p> <p>21 it was dark. In the jail there is no windows. I</p> <p>22 don't know how long it took.</p> <p>23 Q Tell me what occurred after you arrived in the SMU.</p> <p>24 A It just -- for me, I was starting to -- like I said,</p> <p>25 the labor was starting to progress and I was also</p>
Page 151	Page 153
<p>1 a -- when I came back from the hospital later, he had</p> <p>2 said like, he had mentioned: Oh, that was you</p> <p>3 screaming that night? He said: That's crazy. He</p> <p>4 said: I thought it was a crazy person.</p> <p>5 And I knew him from previously being at SMU</p> <p>6 in the beginning of the press -- pregnancy.</p> <p>7 Q What's the nickname?</p> <p>8 A Ace.</p> <p>9 Q And had you talked to Ace at any time other than the</p> <p>10 conversation you just described?</p> <p>11 A As far as from March of 2014 until -- like when I</p> <p>12 gave birth until after I got back? I don't</p> <p>13 understand what you mean "when."</p> <p>14 Q Well, strike that.</p> <p>15 Do you know -- do you know the name,</p> <p>16 nickname, of anyone else that was in the SMU that</p> <p>17 night other than Ace?</p> <p>18 A No, except for the guard and Ace, no, I don't.</p> <p>19 Q And did you have a conversation with the CO at the --</p> <p>20 in the SMU after you arrived?</p> <p>21 A No.</p> <p>22 Q You know -- you know that CO's name?</p> <p>23 A Yes, I do.</p> <p>24 Q What his name?</p> <p>25 A Wenzel.</p>	<p>1 starting to feel withdrawal symptoms. I started</p> <p>2 feeling the contractions pretty strong, pretty close</p> <p>3 together. I started with the diarrhea and the</p> <p>4 vomiting. When it got to a certain point where it</p> <p>5 became unbearable is when I started -- there was like</p> <p>6 a call button like in a hospital, in the SMU, and I</p> <p>7 started pressing it. It's like a cord off the wall,</p> <p>8 and I started pressing the button.</p> <p>9 Q Okay. Let me talk to you about up to that point.</p> <p>10 A Okay.</p> <p>11 Q All right?</p> <p>12 A Uh-huh.</p> <p>13 Q So you said that you began to experience symptoms of</p> <p>14 withdrawal after your arrival at the SMU?</p> <p>15 A Yeah, with -- yeah, over time, uh-huh.</p> <p>16 Q And you believe that was diarrhea and vomiting?</p> <p>17 A Uh-huh, and then --</p> <p>18 Q Yes?</p> <p>19 A And then the hot and the -- see, that part I don't</p> <p>20 know if that was withdrawal. I would assume</p> <p>21 withdrawal and part of the labor, because I have</p> <p>22 experienced it at both times in my life, but the like</p> <p>23 hot and cold flashes and the sweating feeling.</p> <p>24 Q And did that occur before the change in your</p> <p>25 experience of symptoms or the perception of pain in</p>

<p style="text-align: right;">Page 154</p> <p>1 your abdomen? Did those symptoms of hot and cold</p> <p>2 flashes, diarrhea and vomiting occur before you felt</p> <p>3 contractions?</p> <p>4 A No, I think it kind of progressed together at that</p> <p>5 point.</p> <p>6 Q So you think you had the onset of withdrawal symptoms</p> <p>7 and progression of labor at the same time?</p> <p>8 A Coinciding somewhat, yes.</p> <p>9 Q And how long after your arrival in the SMU did you</p> <p>10 start to experience diarrhea and vomiting?</p> <p>11 A Again, I don't know an exact time.</p> <p>12 Q Can you generalize it for me at all?</p> <p>13 A I don't know, maybe within 45 minutes to an hour</p> <p>14 tops.</p> <p>15 Q And at some point those symptoms became, you said,</p> <p>16 unbearable; correct?</p> <p>17 A The labor -- yeah, the labor symptoms more so than</p> <p>18 anything. Because at that point, the labor -- the</p> <p>19 labor symptoms and pains kind of trumped the</p> <p>20 withdrawal symptoms. And, I mean, I guess that was</p> <p>21 more of a concern, an immediate feeling of needing</p> <p>22 help and --</p> <p>23 Q How long had the feelings that you associated with</p> <p>24 withdrawal, how long had those gone on before the</p> <p>25 labor symptoms trumped the withdrawal?</p>	<p style="text-align: right;">Page 156</p> <p>1 A Yeah.</p> <p>2 Q And you said the button is like a hospital. What</p> <p>3 does that mean?</p> <p>4 A Yeah, it looks like -- like I have seen them in</p> <p>5 hospitals. It's like -- it's a cord connected to the</p> <p>6 wall underneath the light, and the cord is kind of</p> <p>7 long enough to go to the bed; and then at the end of</p> <p>8 the cord is a little plastic -- I don't know, a</p> <p>9 little plastic thing you can hold in your hand and</p> <p>10 push the button at the tip of it, and that's what I</p> <p>11 was pushing.</p> <p>12 I know in cells in other pods I have been</p> <p>13 in, it's a metal -- square metal piece on the wall</p> <p>14 that you push a silver button for like an emergency</p> <p>15 situation.</p> <p>16 Q But you're not describing an emergency button in the</p> <p>17 SMU that's -- those aren't something on the wall?</p> <p>18 A No, not the silver ones. I'm saying, that was in a</p> <p>19 different one. The one that's in the SMU is the one</p> <p>20 that you can hold in your hand and push the tip of</p> <p>21 it.</p> <p>22 Q Then can you communicate through it, talk through it?</p> <p>23 A No.</p> <p>24 Q Do you know what happens when you do that?</p> <p>25 A What -- no, I don't know specifically what I thought</p>
<p style="text-align: right;">Page 155</p> <p>1 MS. KLEINHAUS: Objection to form. You can</p> <p>2 answer.</p> <p>3 THE WITNESS: Again, I don't know. Like I</p> <p>4 said, up to that point it kind of coincided, so I</p> <p>5 really don't -- I don't know, because I --</p> <p>6 BY MR. KNOTT:</p> <p>7 Q So you were initially -- go ahead.</p> <p>8 A What I was going to say, people have told me how long</p> <p>9 I was in the cell. I didn't know that for myself.</p> <p>10 So from the time I went into the cell and had the</p> <p>11 baby, I didn't know that for myself, so I don't think</p> <p>12 it would be fair to say that I know it took this</p> <p>13 long, because I don't know.</p> <p>14 Q You don't know because you didn't have a reference</p> <p>15 point?</p> <p>16 A Correct.</p> <p>17 Q It's not because you were unconscious or something?</p> <p>18 A No, it's because I had no reference point. There is</p> <p>19 no clock, no clear window.</p> <p>20 Q Yeah. And did you call for the CO to assist before</p> <p>21 you used the call button?</p> <p>22 A No, I used the call button first.</p> <p>23 Q And if I understand correctly, you sort of tolerated</p> <p>24 both withdrawal and progression of labor on your own</p> <p>25 before you used the call button?</p>	<p style="text-align: right;">Page 157</p> <p>1 was happening. Again, this was just from being in</p> <p>2 jail before, was it the red light above my door would</p> <p>3 go off, signaling like I need help.</p> <p>4 Q Did you see the CO do rounds at any time before you</p> <p>5 used the call button?</p> <p>6 A I -- no.</p> <p>7 Q And did you -- was there any response when you used</p> <p>8 the call button?</p> <p>9 A No.</p> <p>10 Q Did you ever attempt to talk to the CO through the</p> <p>11 door?</p> <p>12 A Yes.</p> <p>13 Q And did he come to the cell front?</p> <p>14 A No, not that I remember him ever coming.</p> <p>15 Q From -- did it appear that CO Wenzel was able to hear</p> <p>16 you when you asked for him initially?</p> <p>17 A Yes.</p> <p>18 MS. KLEINHAUS: Objection to form. Sorry,</p> <p>19 Go ahead.</p> <p>20 THE WITNESS: Yes.</p> <p>21 BY MR. KNOTT:</p> <p>22 Q Is the -- are the cells configured in a way that if</p> <p>23 one is standing outside, they are able to communicate</p> <p>24 with somebody inside? I'm talking about the cell you</p> <p>25 were in.</p>

<p style="text-align: right;">Page 158</p> <p>1 MS. KLEINHAUS: I understood that. I don't</p> <p>2 know. I didn't communicate with anybody through the</p> <p>3 door, but -- you know, like have a conversation. I</p> <p>4 just know that because the cell the guy was in has</p> <p>5 two metal doors with like a glass window in each</p> <p>6 door, and I just know I was screaming really loud</p> <p>7 thinking like I need to be loud so he could hear me,</p> <p>8 and I was pounding on the window of the door, and</p> <p>9 that's how -- well, that's not part of the question,</p> <p>10 but go ahead.</p> <p>11 BY MR. KNOTT:</p> <p>12 Q Were you able to -- before it became unbearable, like</p> <p>13 you said, were you able to stand up and use the</p> <p>14 toilet --</p> <p>15 A Yes.</p> <p>16 Q -- when you vomited or had diarrhea?</p> <p>17 A Yes.</p> <p>18 Q Were you able to get water?</p> <p>19 A Yes.</p> <p>20 Q And you pounded on the window after you had used the</p> <p>21 call button; true?</p> <p>22 A Yes.</p> <p>23 Q And you previously, before you pounded on the window,</p> <p>24 I assumed you called: Hey, CO, can you help me out;</p> <p>25 or something to that effect?</p>	<p style="text-align: right;">Page 160</p> <p>1 been like to his left -- sorry, I will quit moving</p> <p>2 around -- that would have been to his left, and he</p> <p>3 was kind of arced around like this, because there is</p> <p>4 a TV on the other side, and he was watching the TV.</p> <p>5 And that's actually how I figured out that he was</p> <p>6 just ignoring me, because after a while he just</p> <p>7 started going like this, like waving backwards to me.</p> <p>8 Q So I know that you can't -- you have a difficult time</p> <p>9 estimating how long it was after your arrival that</p> <p>10 these symptoms changed, but do you know how long it</p> <p>11 was before the delivery that you started to</p> <p>12 experience a change in your symptoms?</p> <p>13 A Again, I can't tell you exactly how long, but it was</p> <p>14 a while, because I still -- even after that, I still</p> <p>15 was vomiting and vomiting. I got to the point where</p> <p>16 I just felt like I had to take like my pants off and</p> <p>17 my underpants off and was vomiting -- going to the</p> <p>18 bathroom, vomiting. And I remember at a certain</p> <p>19 point I was vomiting and my water broke as I was</p> <p>20 standing there vomiting. So, again, I started</p> <p>21 screaming.</p> <p>22 Shortly after that, I just felt the need</p> <p>23 like I needed to lay down, and I remember still</p> <p>24 having contractions. And I don't know, I mean,</p> <p>25 honestly, I must have -- I must have counted off at</p>
<p style="text-align: right;">Page 159</p> <p>1 A Yeah, I didn't just pound. I was like: Hey, hey, I</p> <p>2 need help, can you please -- I was like: I don't</p> <p>3 know if my button is not working. And he didn't</p> <p>4 respond to me at first, so that's when I started</p> <p>5 pounding and I realized at that point he was just</p> <p>6 ignoring me.</p> <p>7 Q You said your -- you told him your buzzer's not</p> <p>8 working?</p> <p>9 A I assumed it wasn't working because I didn't</p> <p>10 understand why he wasn't coming to check on me.</p> <p>11 Q Do you know if it was working or not?</p> <p>12 A From the fact that it was flashing when I got taken</p> <p>13 out of the room, I would assume that it was.</p> <p>14 Q So you recall that after giving birth, after the EMS</p> <p>15 arrived, you were taken out of the room and you saw</p> <p>16 it flashing?</p> <p>17 A Uh-huh.</p> <p>18 Q "Yes"?</p> <p>19 A Yes. Sorry.</p> <p>20 Q So what was CO Wenzel doing when you initially yelled</p> <p>21 for him?</p> <p>22 A When I initially yelled before I banged on the</p> <p>23 window, there is -- because his desk, the CO desk is</p> <p>24 like right across from the room I was in, and there</p> <p>25 is like a big pillar kind of thing that would have</p>	<p style="text-align: right;">Page 161</p> <p>1 least ten contractions, like trying to breathe</p> <p>2 through them, because I kept holding onto the railing</p> <p>3 next to me. And like: Okay, breathe through this,</p> <p>4 you will get through this, somebody is coming.</p> <p>5 And I remember thinking like -- see, that's</p> <p>6 another reason why I have a problem with the time,</p> <p>7 because I remember when I was in the SMU before, the</p> <p>8 medical staff kept coming in so much it got like</p> <p>9 almost annoying. Like they were literally coming to</p> <p>10 everybody's cells. So I'm thinking: Well, they are</p> <p>11 going to come, they are going to come. So it just</p> <p>12 seemed like forever, like why are they not coming.</p> <p>13 So it just -- it's really hard to make a</p> <p>14 reference, but it was quite a while because there was</p> <p>15 quite a bit of stuff in between.</p> <p>16 Q Okay. So you have said a lot.</p> <p>17 A Sorry.</p> <p>18 Q Just to kind of roll this backwards, in the past,</p> <p>19 when you had been in the SMU prior to this</p> <p>20 incarceration, the medical staff came so often that</p> <p>21 it became annoying to you?</p> <p>22 A Almost, yeah. Because they would come in our cells</p> <p>23 and physically check on us.</p> <p>24 Q And you expected that someone from the nursing staff</p> <p>25 would come and check on you in the cell; correct?</p>

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<p>1 A Yes. Or that that other CO would bring a blanket or something.</p> <p>2 Q Did the blanket ever arrive?</p> <p>3 A No.</p> <p>4 Q And was it after you were pounding on the window that you felt the need to take your pants and underpants off?</p> <p>5 A Yeah -- yes, after the second time I was pounding on the window because my water -- no, wait, how did it go. I took my pants off, I was puking, and then my water broke, so it was after the first time of pounding on the window I took my pants and underpants off and my water broke. It didn't -- yeah.</p> <p>6 Q And the interaction that you described with CO Wenzel where he used his hand to kind of brush you off, was that before you took your pants and underpants off?</p> <p>7 A Yes.</p> <p>8 Q And your testimony is that he -- well, strike that.</p> <p>9 Just to get the visual picture, the window to the cell you were in was how far from -- from CO Wenzel?</p> <p>10 A The window that I was at?</p> <p>11 Q Yeah.</p> <p>12 A I don't know, maybe 6, 7 feet.</p> <p>13 Q Shorter than the distance of this conference room</p>	<p>1 could hear you when you were pounding and yelling?</p> <p>2 A No.</p> <p>3 Q And did you do that pounding and yelling on more than one occasion or --</p> <p>4 A Yes.</p> <p>5 Q And how long -- how many occasions did you do that?</p> <p>6 A The pounding and yelling? At least three times. The yelling, even from the bed, at a certain point got consistent. I just was in there screaming like is somebody going to help me, please I need help, up until the point of pushing.</p> <p>7 Q And are you able to estimate for me in any way the period of time from when your water broke to the time when you started to push?</p> <p>8 A Not -- not really. I mean, I wouldn't guess too much more than a half hour, 45 minutes.</p> <p>9 Q And did you at some point in time try to push the baby out?</p> <p>10 A I -- yes, I tried to hold back contractions and I was screaming that as well, and then I started screaming I couldn't hold it anymore and needed to push.</p> <p>11 Q Do you know how many active voluntary pushes by you were required to deliver the baby?</p> <p>12 A Three.</p> <p>13 Q And how much did the baby weigh?</p>
Page 163	Page 165
<p>1 table?</p> <p>2 A Probably from here to the wall, so if I'm wrong in my distance, but --</p> <p>3 Q And his back was to you?</p> <p>4 A Yes.</p> <p>5 Q And are you describing him leaning sort of on his right hand?</p> <p>6 A Yes.</p> <p>7 Q On his elbow?</p> <p>8 A Yes.</p> <p>9 Q And you pounded --</p> <p>10 A Uh-huh.</p> <p>11 Q -- and he waved you off; correct?</p> <p>12 A Yes.</p> <p>13 Q And is it your testimony that he never came to the window to look at you at all?</p> <p>14 A I don't remember him coming to the window to talk to me or look at me, no.</p> <p>15 Q Did he -- do you have a recollection of him ever standing up from his chair before he came to your cell to discover that the child had been born?</p> <p>16 A No.</p> <p>17 Q You don't think he ever did stand up?</p> <p>18 A I didn't -- no. Nope.</p> <p>19 Q Is there any question in your mind that CO Wenzel</p>	<p>1 A I don't remember. I want to say like six something.</p> <p>2 MR. ARNOLD: I'm sorry, did you say</p> <p>3 three --</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MR. KNOTT:</p> <p>6 Q And when you said before that there were something like ten contractions, did you say that?</p> <p>7 A I said I did a ten count, because you asked how -- that was in reference to how long something was, and that was because I was counting contractions holding on, like okay, breathe through this one, breathe through this one.</p> <p>8 Q So you were counting to ten through contractions?</p> <p>9 A No, I counted ten contractions. As I was holding on trying to breathe through them, okay, that is one down. All right, we can get through this next one. You know, like that.</p> <p>10 Q And was it -- are you saying that it was ten contractions before the baby was delivered?</p> <p>11 A No, I'm just -- I'm saying at that -- whatever the question was, you asked me how long was that. I said, well, there was at least this amount of time in between because I know that there was ten contractions, but I had been puking before that, because you asked how long between -- I forget</p>

<p style="text-align: right;">Page 166</p> <p>1 exactly what the question was, but that was in 2 reference to time. 3 Q And did you ever hear any of the other inmates in the 4 SMU at all that night? 5 A No. 6 Q From your perspective, or as far as you know, they 7 were sleeping? 8 MS. KLEINHAUS: Objection; foundation. You 9 can answer. 10 BY MR. KNOTT: 11 Q You didn't -- strike that, that's a bad question. 12 A Yeah, I just -- 13 Q You didn't hear anything from them? 14 A No, I -- honestly I don't know how I could have heard 15 anything from another cell, the way I was screaming. 16 Q Okay. And tell me what happened when you delivered 17 the baby. So you pushed three times and the baby was 18 delivered? 19 A Well, it started with the pushing. I screamed at 20 him, I'm like: I have got to push, I have got to 21 push, I can't hold it anymore. 22 I pushed the first time. The second time I 23 pushed and it was like an explosion of blood, which 24 scared the crap out of me because I had a mirror to 25 watch my other two children born, and I never seen</p>	<p style="text-align: right;">Page 168</p> <p>1 and say "medical all call." 2 And the next thing I remember was a little 3 while -- it wasn't like a little while, like long, 4 but a few minutes later I saw the first nurse arrive 5 at the door -- the outside door, and I heard her too 6 say "pop the door." 7 And then she held the door open, and 8 another nurse ran in front of her and opened that 9 door. And she came in and she said, "hell, no, I'm 10 not cutting no umbilical cord." 11 And I was like: Well, do you want me to 12 chew it apart, because I've like pretty much done 13 everything here, can I please get somebody to help 14 me. 15 The next thing I remember after that was 16 the EMTs moving me to a gurney, like picking the 17 sheet up and moving me over. 18 Q Do you believe that you were unconscious at some 19 point? 20 A I do. 21 Q And obviously you wouldn't know how long you were 22 unconscious? 23 A No. 24 Q And CO Wenzel, if I recall correctly, you had never 25 seen him before that night?</p>
<p style="text-align: right;">Page 167</p> <p>1 anything like that, so I'm screaming, like there is 2 blood, there is blood, please help me, please help 3 me. I pushed the third time and the baby came out 4 and I'm just like looking at him like what -- you 5 know, I was just in shock, like what just happened. 6 And then I started screaming: The baby is 7 here, the baby is here, please help me, help me. And 8 I stopped screaming because I see the baby kind of 9 like shaking, and I'm like -- I'm looking at him, and 10 he's blue and he's trying to breathe and making like 11 a gurgling noise, like (witness makes noise). And 12 I'm thinking, I'm like, he can't breathe, you know, 13 and I'm like trying to figure out like what am I 14 supposed to do, because obviously nobody is coming. 15 These people don't care. 16 So I'm like going over options in my head. 17 Ultimately I decided that I'm going to have to stick 18 my finger down his throat and clear the mucus out. 19 And I did. And I wrapped him in a sheet, 20 and he started breathing. I held him for a little 21 while, and that's the first time that I saw the CO 22 finally like cup his hand at my door. And I could 23 hear -- actually, yeah, going back to your other 24 question, I could hear him right there say, "oh, 25 shit." And then I heard him grab the walkie-talkie</p>	<p style="text-align: right;">Page 169</p> <p>1 A No. 2 Q And do you have any reason to think that he disliked 3 you for some reason? 4 A I know that went through my head that night, like 5 what the hell is wrong with this guy. I'm thinking 6 like -- I don't even know this dude, you know, why 7 won't he call somebody. 8 Q Ms. Terry, we can get you Kleenex. I'm sorry. 9 A That's fine. 10 MR. KNOTT: Can we just take a break? 11 MS. KLEINHAUS: Sure. 12 THE VIDEOGRAPHER: Going off the record at 13 5:09 p.m. 14 (Recess was taken.) 15 THE VIDEOGRAPHER: Back on the record at 16 5:11 p.m. 17 BY MR. KNOTT: 18 Q I won't ask you to continue on with your answer or 19 ask that question again. 20 A Okay. 21 Q I just want to ask, as far as you know, CO Wenzel had 22 no personal dislike of you? 23 A No. 24 Q And did you ever see another correctional officer or 25 anyone else enter the special medical unit after you</p>

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<p>1 arrived and before you gave birth?</p> <p>2 A No.</p> <p>3 Q And if CO Wenzel's supervisor were to have testified</p> <p>4 that she was in the SMU minutes before you gave</p> <p>5 birth, you would dispute that?</p> <p>6 A Yes.</p> <p>7 Q You didn't see anybody walk around the SMU the entire</p> <p>8 time you were there?</p> <p>9 A No.</p> <p>10 Q And --</p> <p>11 A I'm sorry, can I amend what I just said? I guess --</p> <p>12 okay, yeah, I didn't see anybody walk around there.</p> <p>13 And I guess the point why I would dispute that would</p> <p>14 be like if it was a supervisor, why wouldn't they</p> <p>15 have done something, because I know at that point I</p> <p>16 was screaming, except for the pushing. But I know</p> <p>17 that too, I have seen lieutenants do rounds, and in</p> <p>18 my experience they take much more time than a regular</p> <p>19 CO to actually look in each cell. And I didn't</p> <p>20 experience that, so I think I would have noticed it</p> <p>21 because I was facing the door, but -- sorry, go</p> <p>22 ahead.</p> <p>23 Q Okay. The baby was delivered; you heard a gurgling</p> <p>24 noise. Did you then take the baby from between your</p> <p>25 legs and bring it up to your breast?</p>	<p>1 Q It was pink and warm after you cleared the baby's</p> <p>2 throat?</p> <p>3 A It took a little bit, but he became to -- I don't</p> <p>4 know about warm, but I'm assuming -- I mean, he -- he</p> <p>5 did turn pink from a bluish color. I don't know</p> <p>6 about warm, because I had already had him wrapped in</p> <p>7 a sheet, and still at this point the blood was still</p> <p>8 pretty warm, so I couldn't -- yeah, I wouldn't have</p> <p>9 known. I don't know.</p> <p>10 Q And did you continue screaming?</p> <p>11 A No, not at this point. I screamed a couple of times</p> <p>12 after he came out before I cleaned his throat, but</p> <p>13 not afterwards because I just felt like -- when I was</p> <p>14 screaming, there was such an out loud echo, and I</p> <p>15 just felt -- I felt like what the hell. You know,</p> <p>16 like he's little, I just felt like I already -- like</p> <p>17 I didn't want to hurt him anymore.</p> <p>18 Q So you had stopped screaming. Did you press the</p> <p>19 button again?</p> <p>20 A No.</p> <p>21 Q So you never pressed the button after the birth?</p> <p>22 A No.</p> <p>23 Q And, again, are you able to estimate the amount of</p> <p>24 time after the birth before the CO came to your</p> <p>25 window?</p>
Page 171	Page 173
<p>1 A No. I cleaned his throat. I cleaned his throat</p> <p>2 while he was still on the bed between my legs. I</p> <p>3 didn't pick him up until after that. Because he --</p> <p>4 when he came out, he kind of like landed there on his</p> <p>5 side. I was -- to be honest, I wasn't expecting him</p> <p>6 to come out, so it was like shocking. But yeah, I</p> <p>7 cleaned his throat out there and then wrapped him up</p> <p>8 in a sheet, and then -- yeah.</p> <p>9 Q Okay. So you're describing sort of sitting up. You</p> <p>10 sat up in order to reach the baby?</p> <p>11 A Yes.</p> <p>12 Q And you took your sheet and wrapped the baby up?</p> <p>13 A Yes.</p> <p>14 Q And you had cleared the baby's throat?</p> <p>15 A Uh-huh.</p> <p>16 Q "Yes"?</p> <p>17 A Yes, yes, I'm sorry.</p> <p>18 Q Using your finger?</p> <p>19 A Yes.</p> <p>20 Q And did it -- did that cause the gurgling sound to</p> <p>21 stop?</p> <p>22 A It did.</p> <p>23 Q And did the baby appear to be in distress after you</p> <p>24 cleared its throat?</p> <p>25 A No.</p>	<p>1 A I don't know how many minutes -- it wasn't like hours</p> <p>2 or anything like that. It was within some amount of</p> <p>3 minutes, because I remember looking at the baby when</p> <p>4 he started turning pink, and he was just laying</p> <p>5 there. He was breathing peacefully, and then at a</p> <p>6 certain point he started to cry. And I don't know,</p> <p>7 he cried for a few minutes, and then the CO came to</p> <p>8 the door.</p> <p>9 Q And are you able to estimate -- well, strike that.</p> <p>10 You said it was a matter of minutes. Would</p> <p>11 you say it was less than 10 minutes after birth</p> <p>12 before the CO came to the door?</p> <p>13 A I don't know, maybe 10 or 15 minutes.</p> <p>14 Q I'm sorry, what was --</p> <p>15 A Maybe 10, 15 minutes.</p> <p>16 Q And you heard the CO use his radio or his microphone</p> <p>17 in order to call for more assistance; right?</p> <p>18 A Yeah, I saw him pick it up off his hip and I heard</p> <p>19 him, yes.</p> <p>20 Q And you heard him say before that "oh, shit"; right?</p> <p>21 A Yeah, when he cupped his hands at the window.</p> <p>22 Q And did he say anything else?</p> <p>23 A That's all I heard was "oh, shit," and then he said</p> <p>24 the medical all call thing in the walkie-talkie.</p> <p>25 Q And how long from that call until you started to hear</p>

<p style="text-align: right;">Page 174</p> <p>1 an emergency response?</p> <p>2 A As far as the emergency response, like I said, all I</p> <p>3 saw or heard was a few minutes later -- maybe, I</p> <p>4 don't know, five, six minutes later is when that</p> <p>5 nurse got there to the first door and said: Pop the</p> <p>6 door, pop the door. They popped the door, and then</p> <p>7 the second nurse ran past her, and that door opened</p> <p>8 in, and then that was when she was like: Oh, hell,</p> <p>9 no, I'm not cutting no umbilical cord.</p> <p>10 Q Did they -- did you ask them whether they should cut</p> <p>11 the umbilical cord?</p> <p>12 A No, not -- No, I just asked them, like, well, can you</p> <p>13 please get somebody to help me, like I did the hard</p> <p>14 work, I can't chew it apart. I remember being --</p> <p>15 like making a smart aleck remark like that, like are</p> <p>16 you kidding me.</p> <p>17 Q And how many nurses responded, if you recall?</p> <p>18 A At that point I only saw the two of them. And once I</p> <p>19 saw them come in the door and then said, "well, can</p> <p>20 you get somebody to help me" is when I just felt</p> <p>21 like -- I remember just feeling like a wave of</p> <p>22 relief. Like, okay, like somebody is here now, and</p> <p>23 I -- I think that's when I passed out the first time.</p> <p>24 Q And your next memory is you were loaded on an EMS</p> <p>25 cart?</p>	<p style="text-align: right;">Page 176</p> <p>1 ambulance on your transport to Sinai?</p> <p>2 A No, I don't.</p> <p>3 Q Do you remember if you were restrained in any way in</p> <p>4 your transport?</p> <p>5 A I don't remember. That's not true, I do remember</p> <p>6 seeing a strap right here from the gurney, but that's</p> <p>7 all I remember.</p> <p>8 Q Okay. So the ambulance gurney had like sort of a</p> <p>9 seatbelt; is that what you're saying?</p> <p>10 A Yeah, kind of like it looked like a seatbelt.</p> <p>11 Anything below there, I don't know.</p> <p>12 Q And you were seated in kind of the upright position</p> <p>13 in the gurney or were you laying flat?</p> <p>14 A No, I was laying flat.</p> <p>15 Q I'm sorry, and the baby was on your chest?</p> <p>16 A Yes, sir.</p> <p>17 Q And then you passed out again?</p> <p>18 A Yes.</p> <p>19 Q And you -- do you remember anything in the emergency</p> <p>20 room? Do you remember any conversations you had</p> <p>21 there?</p> <p>22 A I remember two women, if I had to guess, they were</p> <p>23 nurses, being towards like waist down of me. And</p> <p>24 they were -- excuse me, I remember them massaging</p> <p>25 like my lower abdomen. And I'm looking, I'm like</p>
<p style="text-align: right;">Page 175</p> <p>1 A Yeah. Yes.</p> <p>2 Q And you were taken to Aurora Sinai?</p> <p>3 A Yes.</p> <p>4 Q And did you receive all the care that you felt you</p> <p>5 needed at Aurora Sinai?</p> <p>6 A Yes.</p> <p>7 Q Did you tell the doctors and nurses at Aurora Sinai</p> <p>8 what had happened?</p> <p>9 A You mean like when we got there?</p> <p>10 Q Yes.</p> <p>11 A No, I was in and out of consciousness. I don't --</p> <p>12 there were many stories floating around I know.</p> <p>13 Q Do you remember being -- do you remember being in an</p> <p>14 ambulance going to Sinai?</p> <p>15 A The only thing -- yeah, I do. I remember looking</p> <p>16 down, and that's when the EMT told me the baby was on</p> <p>17 my chest. And I said something to the effect of</p> <p>18 like, you know, don't let him fall off. And I looked</p> <p>19 at him, and that's -- he had like paper towel on him?</p> <p>20 And I was like: Why does he have paper towel on him.</p> <p>21 And the EMT guy was like: Well, the County wouldn't</p> <p>22 let us take the sheet, or something like that. And</p> <p>23 that's when I passed out again, and that's when I</p> <p>24 remember waking up in the hospital.</p> <p>25 Q Do you remember any security officers in the</p>	<p style="text-align: right;">Page 177</p> <p>1 where is the baby, and they like -- they explained to</p> <p>2 me he was on my right-hand side. He was fine. The</p> <p>3 doctors were working on him and putting medicine in</p> <p>4 his eyes.</p> <p>5 And that -- I remember saying something</p> <p>6 like: Oh, you cut the cord. And she is like: Yeah,</p> <p>7 you know, now we have to get your help for the rest</p> <p>8 of it. And then I said: Oh, I know this part. Like</p> <p>9 I remember before, with my other two children, I was</p> <p>10 like this is getting the placenta out. And I was</p> <p>11 like: Oh, this is the best part. I'm sorry, I don't</p> <p>12 mean to laugh. But she was like: What? Everybody</p> <p>13 hates this part. And I'm like: Just get it out of</p> <p>14 here. Just get it out.</p> <p>15 Like I was just like this has been an</p> <p>16 ordeal, just get it out now. And then the next thing</p> <p>17 I remember is being -- waking up in my room, like a</p> <p>18 regular hospital room.</p> <p>19 Q And were you given pain medication at that time?</p> <p>20 A I don't know. I know -- I know that once I was awake</p> <p>21 and could make up my own mind, I refused pain</p> <p>22 medicine, like narcotic pain medicine.</p> <p>23 Q I'm sorry, you said once you were awake you refused</p> <p>24 narcotic pain medication?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 178</p> <p>1 Q Did the nurses talk to you at all about why they</p> <p>2 didn't want you to deliver the placenta at the jail?</p> <p>3 Did they say anything to you? And I mean the jail</p> <p>4 nurses.</p> <p>5 A No.</p> <p>6 Q Did anyone at any time after that birth tell you that</p> <p>7 the rapid delivery was related to the drug use?</p> <p>8 A No. I was actually told that it may have been</p> <p>9 because it was my third child. But, I mean, nobody</p> <p>10 else was there, so who knows, but -- that was</p> <p>11 strictly a guess in my opinion. I mean, it was a</p> <p>12 doctor that said it. But, again, I just -- I</p> <p>13 don't -- I don't know what it was.</p> <p>14 Q Of the nurses that responded to the SMU cell, did any</p> <p>15 of them -- were they rude to you or disrespectful to</p> <p>16 you?</p> <p>17 A The only one that -- I mean -- well, besides the</p> <p>18 nurse saying "pop the door," the only one that I</p> <p>19 remember really talking to where I can remember what</p> <p>20 she said was -- I mean, I felt like it was rude,</p> <p>21 like, "Oh hell, no, I'm not cutting no umbilical</p> <p>22 cord." But I guess I felt like it was rude because I</p> <p>23 have just been sitting there screaming for how long.</p> <p>24 Obviously like how is this not a medical emergency.</p> <p>25 Like you guys are medical people. That's how I felt.</p>	<p style="text-align: right;">Page 180</p> <p>1 just simply forgot about it until just a little while</p> <p>2 ago, and I told you about it.</p> <p>3 Q Arc I think you told me was in -- was it 2015?</p> <p>4 A Yes, September 2015 to February 2016.</p> <p>5 Q Is it your testimony that you didn't receive any</p> <p>6 therapy or treatment for drug addiction, counseling</p> <p>7 for drug addiction or abuse at any time between</p> <p>8 January 1, 2012 and December 31, 2015, except for</p> <p>9 Arc?</p> <p>10 A I'm trying to think of the date it would have been.</p> <p>11 I guess maybe I didn't think of that either. Like I</p> <p>12 had -- I was on Methadone in that period of time as</p> <p>13 well. It would have been -- um, give me one second</p> <p>14 to try to think of the dates -- approximate dates.</p> <p>15 I think July of 2013 is when I stopped</p> <p>16 going to the Methadone Clinic, and then before that I</p> <p>17 started in maybe October of 2012.</p> <p>18 MR. KNOTT: Counsel, are we going to be</p> <p>19 provided authorizations to obtain her treatment in</p> <p>20 counseling?</p> <p>21 MS. KLEINHAUS: We contend it's not</p> <p>22 relevant to damages. We're not seeking damages for</p> <p>23 any self-medication as a result of this incident that</p> <p>24 may have been done via Methadone, so that's our</p> <p>25 position. We allowed her to answer all the questions</p>
<p style="text-align: right;">Page 179</p> <p>1 So I did feel disrespected in that way.</p> <p>2 Q Bear with me just a second here.</p> <p>3 So I want to show you Exhibit 12.</p> <p>4 A Okay.</p> <p>5 Q And those are responses to interrogatories that we</p> <p>6 had sent to you.</p> <p>7 A Okay.</p> <p>8 Q And do you recall providing information for a</p> <p>9 response to these?</p> <p>10 A I do.</p> <p>11 Q And you tried to provide complete and accurate and</p> <p>12 truthful responses at that time?</p> <p>13 A At that time, yes.</p> <p>14 Q And at question 5, one of the things that we asked</p> <p>15 you was did you receive treatment or counseling for</p> <p>16 drug addiction or abuse at any time between</p> <p>17 January 1, 2012 and December 31, 2015.</p> <p>18 And we didn't receive any identification of</p> <p>19 treatment providers in that response. Do you see</p> <p>20 that?</p> <p>21 A I do.</p> <p>22 Q And today you have talked about treatment that you</p> <p>23 have obtained at UCC?</p> <p>24 A UCC was just recently. This -- the only one that I</p> <p>25 had between these dates would have been Arc, and I</p>	<p style="text-align: right;">Page 181</p> <p>1 about everywhere she got treatment.</p> <p>2 MR. KNOTT: This is the problem, I don't</p> <p>3 know where you -- I don't know where she got</p> <p>4 treatment, because you didn't answer the question, so</p> <p>5 I'm shooting in the dark here.</p> <p>6 MS. KLEINHAUS: She told you about it all</p> <p>7 day today for several hours. I let her answer all of</p> <p>8 that, so you have all of that information.</p> <p>9 MR. KNOTT: Do you understand why that</p> <p>10 would be even more distressing to me, that you</p> <p>11 objected to it and didn't give us the information,</p> <p>12 and then sitting here in a deposition you don't think</p> <p>13 that it's objectionable and I'm supposed to sit in a</p> <p>14 deposition without any records and take the</p> <p>15 deposition? I mean, if it was harassing when I sent</p> <p>16 these interrogatories, why isn't it harassing now?</p> <p>17 MS. KLEINHAUS: I made an extensive record</p> <p>18 today about questions about drug use being harassing.</p> <p>19 In an effort to be efficient, I've also allowed some</p> <p>20 questions to be answered about drug use, and so you</p> <p>21 have that information.</p> <p>22 MR. KNOTT: And is it your position that</p> <p>23 you will not provide authorizations for her</p> <p>24 counseling and therapy over the years?</p> <p>25 MS. KLEINHAUS: Not unless there is some</p>

<p style="text-align: right;">Page 182</p> <p>1 proffer how it relates to this case.</p> <p>2 MR. KNOTT: That's not how it works. We</p> <p>3 don't have to prove relevance to the plaintiff's</p> <p>4 counsel in order to get an authorization.</p> <p>5 MS. KLEINHAUS: Okay. Well, in the</p> <p>6 interest of time, she has given you all the</p> <p>7 information she has.</p> <p>8 MR. KNOTT: Yeah.</p> <p>9 MS. KLEINHAUS: And now, you know, you</p> <p>10 disagree with my position. That's where we are.</p> <p>11 MR. KNOTT: Yeah. Do you think it would</p> <p>12 have -- I don't agree that it's appropriate to stiff</p> <p>13 the defense counsel and then expect them to take a</p> <p>14 deposition without the benefit of any records, and</p> <p>15 then take the position that I should have been able</p> <p>16 to ask all the questions. I would like an agreement</p> <p>17 that you will provide appropriate authorizations for</p> <p>18 the treatment, and the deposition isn't going to be</p> <p>19 completed until we finish -- until we obtain the</p> <p>20 records and see what treatment she has been provided</p> <p>21 and the stressors she has had over her life.</p> <p>22 BY MR. KNOTT:</p> <p>23 Q Ms. Terry, if you could look at Interrogatory No. 3,</p> <p>24 your counsel took the position that your obstetric</p> <p>25 and gynecological treatment was irrelevant also</p>	<p style="text-align: right;">Page 184</p> <p>1 A Correct.</p> <p>2 Q And in the final sentence of the response to</p> <p>3 Interrogatory No. 3, it says, "Plaintiff believes she</p> <p>4 has seen healthcare providers through the Aurora</p> <p>5 Healthcare network since 2012"; right?</p> <p>6 A Correct.</p> <p>7 Q And that's not a complete statement we learned today</p> <p>8 during this deposition; right?</p> <p>9 A Yes, I did say that I have gone to Planned Parenthood</p> <p>10 besides that.</p> <p>11 Q Any other healthcare providers you have seen since</p> <p>12 2012 other than those in the Aurora Healthcare</p> <p>13 network and Planned Parenthood and the therapists and</p> <p>14 counselors that you have seen and the --</p> <p>15 A No, not that I can think of.</p> <p>16 Q I want to make sure before we complete the</p> <p>17 deposition, and I do have more questions, but I want</p> <p>18 to make sure that I have talked to you about all of</p> <p>19 the conversations you had with the jail staff on</p> <p>20 March 9 and March 10.</p> <p>21 Do you think that we have exhausted that</p> <p>22 line of questioning and you have discussed with me</p> <p>23 everything you remember about those conversations?</p> <p>24 A Yes, sir.</p> <p>25 Q Was that "yes, sir"?</p>
<p style="text-align: right;">Page 183</p> <p>1 and --</p> <p>2 MS. KLEINHAUS: Then we negotiated an</p> <p>3 agreement with you where she signed releases.</p> <p>4 BY MR. KNOTT:</p> <p>5 Q Okay. And the plaintiff has agreed to disclose</p> <p>6 medical records. I heard you say that you obtained</p> <p>7 reproductive health treatment at Planned Parenthood;</p> <p>8 is that correct?</p> <p>9 A Yeah -- yeah, like annual testing type of thing.</p> <p>10 Q I'm sorry?</p> <p>11 A Like Pap smears.</p> <p>12 Q And did you tell your counsel that?</p> <p>13 MS. KLEINHAUS: Objection, calls for</p> <p>14 privileged information. You don't have to tell him</p> <p>15 about conversations you had with your attorney.</p> <p>16 BY MR. KNOTT:</p> <p>17 Q I will withdraw it.</p> <p>18 When you looked at these interrogatories</p> <p>19 before signing them, did you -- did you think that --</p> <p>20 that someone other than Aurora healthcare should be</p> <p>21 listed as a response to healthcare providers you had</p> <p>22 seen since 2012?</p> <p>23 A I'm sorry, can you say that one more time?</p> <p>24 Q You looked at these interrogatory responses and</p> <p>25 signed them; correct?</p>	<p style="text-align: right;">Page 185</p> <p>1 A Yes.</p> <p>2 Q You don't have call me "sir," but --</p> <p>3 A Just force of habit.</p> <p>4 Q But the answer is yes.</p> <p>5 You were -- I want to show you Exhibit 2.</p> <p>6 You were arrested and incarcerated at the Milwaukee</p> <p>7 County Jail in June of 2010; correct?</p> <p>8 A That's sounds about right.</p> <p>9 Q Was that the first time you had come to the Milwaukee</p> <p>10 County Jail?</p> <p>11 A I believe so, yes.</p> <p>12 Q And any reason to dispute this record, that you</p> <p>13 received a prompt mental health assessment?</p> <p>14 MS. KLEINHAUS: Do you want to take a</p> <p>15 second and just review Exhibit 2 so you're familiar</p> <p>16 with it?</p> <p>17 THE WITNESS: Yeah, I know what this is</p> <p>18 already. Yeah, I'm sorry, could you say your -- ask</p> <p>19 your question one more time.</p> <p>20 BY MR. KNOTT:</p> <p>21 Q On page 1 --</p> <p>22 A Uh-huh.</p> <p>23 Q -- if you look at appointment type, it says "Referral</p> <p>24 for psychiatric services."</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 186</p> <p>1 Q And the note -- the second note indicates</p> <p>2 "psychiatric progress note." In all honesty, I'm not</p> <p>3 sure whether that is actually people interacting with</p> <p>4 you or whether they are reviewing records, but do you</p> <p>5 have any reason to doubt that you were assessed for</p> <p>6 psychiatric needs in June of 2010?</p> <p>7 A No, I don't.</p> <p>8 Q And it says you were -- had been prescribed Xanax at</p> <p>9 that time?</p> <p>10 A Uh-huh.</p> <p>11 Q "Yes"? Correct?</p> <p>12 A Yes, that's --</p> <p>13 Q If you turn to page 2 of the exhibit, it's actually</p> <p>14 630 at the bottom.</p> <p>15 A Uh-huh.</p> <p>16 Q It says -- and I'm looking at subjective. This is a</p> <p>17 booking note by an RN at 2:01 a.m. on June 18. It</p> <p>18 says, quote: I have a prescription for Xanax 1 to 2</p> <p>19 milligrams a day, but I don't take them that way. I</p> <p>20 took one two days ago and therefore last -- excuse</p> <p>21 me -- and before that last week sometime -- strike</p> <p>22 that. There is no periods in here. Let me stop</p> <p>23 there.</p> <p>24 Do you recall that you had a prescription</p> <p>25 for Xanax in June 2010?</p>	<p style="text-align: right;">Page 188</p> <p>1 was told -- yes, I was told that I had an anxiety</p> <p>2 disorder, but --</p> <p>3 BY MR. KNOTT:</p> <p>4 Q When were you told that?</p> <p>5 A I don't know. A very long time ago.</p> <p>6 Q And who was that doctor?</p> <p>7 A Dr. Stephen Callaghan in Racine.</p> <p>8 Q And he prescribed you anti-anxiety medications?</p> <p>9 A He did at that time, but he also prescribed me ADHD</p> <p>10 medication.</p> <p>11 Q Okay.</p> <p>12 A Which I didn't have.</p> <p>13 Q And what was the -- and did you go to him seeking</p> <p>14 drugs?</p> <p>15 A No, I went to him seeking help.</p> <p>16 Q And he prescribed for you for conditions that you</p> <p>17 don't think you had?</p> <p>18 A No, and the reason I say that is because later I</p> <p>19 found out that that's what he gave 90 percent of his</p> <p>20 patients.</p> <p>21 Q What was the drug -- the ADHD drug?</p> <p>22 A Adderall.</p> <p>23 Q And did you take it?</p> <p>24 A I did.</p> <p>25 Q Did you sell it?</p>
<p style="text-align: right;">Page 187</p> <p>1 A I recall lying to the nurse that I had a prescription</p> <p>2 for Xanax, yes.</p> <p>3 Q So you were not truthful with the nurse doing the</p> <p>4 booking assessment in 2010?</p> <p>5 A No, that was -- again, that was, like you said, my</p> <p>6 first time in jail. And someone was like, oh, if you</p> <p>7 tell them that you take that, so it was basically</p> <p>8 drug seeking.</p> <p>9 Q So you knew that Xanax was an anti-anxiety</p> <p>10 medication?</p> <p>11 A Right.</p> <p>12 Q And so you lied to the nurse that you had a valid</p> <p>13 prescription for Xanax?</p> <p>14 A Right.</p> <p>15 Q So that you could get Xanax in the jail; right?</p> <p>16 A Right, because I was -- I was, yeah, trying to</p> <p>17 self-medicate because I felt anxious.</p> <p>18 Q And you felt anxious -- did you have an anxiety</p> <p>19 condition before being brought to the jail in June of</p> <p>20 2010?</p> <p>21 MS. KLEINHAUS: Objection to form, I'm</p> <p>22 sorry, and foundation. Go ahead.</p> <p>23 THE WITNESS: I was told that I did, but</p> <p>24 later that doctor was proven to just give bogus</p> <p>25 diagnoses and stuff like that, so I never really -- I</p>	<p style="text-align: right;">Page 189</p> <p>1 A No.</p> <p>2 Q And what was the anti-anxiety medication that he gave</p> <p>3 you?</p> <p>4 A It was Xanax.</p> <p>5 Q And did you take that drug?</p> <p>6 A I did. I would use -- I would have to take the</p> <p>7 Adderall to be awake and the Xanax to go to sleep</p> <p>8 until I just stopped taking everything.</p> <p>9 Q And you said it was a long time ago. At what age?</p> <p>10 A I -- my -- 22 to 24, maybe.</p> <p>11 Q And how long did you take Xanax?</p> <p>12 A I don't know, maybe six to eight months, and I just</p> <p>13 stopped taking both prescriptions.</p> <p>14 Q And do you dispute today that you had an anxiety</p> <p>15 condition before March of 2014?</p> <p>16 A A condition, yes. I don't believe I had an anxiety</p> <p>17 condition.</p> <p>18 Q You periodically had anxiety?</p> <p>19 A Yes.</p> <p>20 Q And other than what Dr. Callaghan had prescribed, had</p> <p>21 you ever taken medications for that?</p> <p>22 A No.</p> <p>23 Q It says in the note, quote: I tried to hurt myself</p> <p>24 at age 13, 14, and 15. Is that truthful?</p> <p>25 A That is.</p>

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<p>1 Q Do you have any reason to doubt that your medical and 2 mental health needs were attended to in the Milwaukee 3 County Jail when you were arrested in June 2010? 4 A No. 5 Q Exhibit 3 are records from an arrest in May of 2011. 6 Tell me when you've had an opportunity to review 7 those. 8 A Uh-huh. 9 Q Is that -- 10 A Sorry, I was reading. Sorry about that. 11 Q So I'm going to start. 12 A Go ahead. 13 Q Tell me when you're ready to talk. 14 A Go ahead. 15 Q Okay. I'm going to start at the back. On page 622, 16 there is an oral health assessment. Do you remember 17 having an assessment of your -- an oral screening 18 evaluation in May of 2011? 19 A No, I don't. I don't remember specifically what this 20 was. 21 Q Do you dispute that the nurse assessed your oral 22 health needs in order to determine whether you needed 23 dental care? 24 A I don't remember. 25 Q And the top of that page, this is 622, there is a</p>	<p>1 A Correct. 2 Q And you understand that to be so that your pregnancy 3 or whether you're pregnant or not can be confirmed 4 and healthcare referrals made based on whether you're 5 found to be pregnant or not; right? 6 MS. KLEINHAUS: Objection; foundation, 7 form. You can answer. 8 BY MR. KNOTT: 9 Q You know that to be true, don't you? 10 A That they give a urine test every time you come into 11 jail? 12 Q Yeah. 13 A Yes. 14 Q And you know that's because they are trying to screen 15 you to determine whether you have obstetric needs; 16 true? 17 MS. KLEINHAUS: Objection; foundation. You 18 can answer. 19 THE WITNESS: I just know that it's -- 20 yeah, to determine whether you're pregnant or not. 21 BY MR. KNOTT: 22 Q And turning to page 620 to 621, there is an 23 assessment titled "psychiatric progress note." It 24 looks like it's by a social worker. It says, "Seen 25 in 14-day mental health assessment." Do you have any</p>
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<p>1 SOAP note. It's a booking note by an RN. It says, 2 under subjective, "Inmate reports past psyche SISA as 3 a teen." I think that my suicidal ideation and 4 suicidal acts as a teen. Is that something you 5 reported? 6 A Probably. 7 Q And it says in the plan, "Refer to a nurse 8 practitioner, a dentist, psych social worker as 9 needed." 10 Do you have any reason to dispute that an 11 assessment was done and a plan was made to refer you 12 for any needs you would have on that incarceration? 13 A No. 14 Q If you turn to page 621, there is a SOAP note 15 indicating that your urine was tested and it was 16 negative. Any reason to dispute that lab analysis of 17 your urine was obtained on May 17, 2011? 18 A That it was obtained? Yes. 19 Q You have no reason to doubt that it was obtained; 20 true? 21 A True, I -- true. 22 Q In fact, your urine is obtained and tested on each 23 incarceration? 24 A Uh-huh. 25 Q And every incarceration; correct?</p>	<p>1 reason to dispute that you were given a mental health 2 assessment in May 2011? 3 MS. KLEINHAUS: I'm sorry, where are you 4 for that? 5 MR. KNOTT: The carry-over page from 620 to 6 621. 7 MS. KLEINHAUS: Okay. Sorry, go ahead. 8 THE WITNESS: No, I don't have any reason 9 to doubt that. 10 BY MR. KNOTT: 11 Q And if you go to page 618, it looks like there is a 12 longer note of that assessment by social worker 13 Williams. It indicates that you were assessed on 14 May 17; correct? 15 A Uh-huh. 16 Q "Yes"? 17 A Yes. 18 Q And it says on page 619: Do you have a mental health 19 diagnosis? Answer: Yes, anxiety. 20 Was that truthful at that time? 21 A Yes. Uh-huh, yes. 22 Q And it indicates you were received -- that you had 23 received META House substance abuse treatment in 24 2011; correct? 25 A Correct.</p>

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<p>1 Q On the carryover page from 617 to 618, there is</p> <p>2 another note by social worker Williams, and it</p> <p>3 indicates that you had submitted an inmate request</p> <p>4 form, I think, to speak to a psych social worker.</p> <p>5 Inmate described herself as very anxious. Inmate</p> <p>6 stated she has been trying to keep her anxiety under</p> <p>7 control by self talk.</p> <p>8 Were you experiencing actual anxiety when</p> <p>9 you submitted a request form to see the psych social</p> <p>10 worker?</p> <p>11 A Yes.</p> <p>12 Q And the assessment was anxious and depressed. Is</p> <p>13 that an accurate assessment?</p> <p>14 A Yes.</p> <p>15 Q Any reason to dispute that?</p> <p>16 A No.</p> <p>17 Q Do you have any reason to dispute that your medical</p> <p>18 and mental health needs were met promptly in your</p> <p>19 arrest in June 2011?</p> <p>20 A No.</p> <p>21 MS. KLEINHAUS: Objection to form. Sorry I</p> <p>22 was late.</p> <p>23 THE WITNESS: Sorry.</p> <p>24 BY MR. KNOTT:</p> <p>25 Q I'm going to show you Exhibit 4, which are records of</p>	<p>1 Q And --</p> <p>2 A Excuse me.</p> <p>3 Q So would you put a "1" next to the assessment by</p> <p>4 Nurse Wigley, W-i-g-l-e-y, on page 611?</p> <p>5 A Uh-huh.</p> <p>6 Q Have you done that?</p> <p>7 A I have.</p> <p>8 Q And turn next to page 609.</p> <p>9 A (Witness complies.) All right.</p> <p>10 Q There is a -- at the bottom of the page there is</p> <p>11 vital signs taken.</p> <p>12 Did you ever have vital signs taken by</p> <p>13 anybody but a nurse at the jail?</p> <p>14 A No, not that I know of.</p> <p>15 Q Could you put a "2" on page 609.</p> <p>16 A Okay.</p> <p>17 Q You reported allergies to iodine and shell fish.</p> <p>18 That's truthful; correct?</p> <p>19 A Yes. Yes.</p> <p>20 Q So we know she interviewed you?</p> <p>21 A Yes.</p> <p>22 Q Page 608, Nurse Wigley did a clinical narcotic opiate</p> <p>23 withdrawal scale?</p> <p>24 A Okay.</p> <p>25 Q And it looks like that was the same assessment as you</p>
Page 195	Page 197
<p>1 your arrest in August of 2013.</p> <p>2 MS. KLEINHAUS: Do you have a copy?</p> <p>3 MR. KNOTT: I'm sorry?</p> <p>4 MS. KLEINHAUS: Do you have a copy?</p> <p>5 MR. KNOTT: Oh, I'm sorry.</p> <p>6 BY MR. KNOTT:</p> <p>7 Q And Ms. Terry, I'm going to give you my pen, and I'm</p> <p>8 going to ask you to note the number of times you were</p> <p>9 seen and assessed during this admission.</p> <p>10 In August of 2013, you were six weeks</p> <p>11 pregnant -- right? -- or eight weeks?</p> <p>12 A Yes, I believe so.</p> <p>13 Q And is it your testimony that before being arrested</p> <p>14 in August of 2013, you had gone and obtained an</p> <p>15 ultrasound?</p> <p>16 A I believe so, yes.</p> <p>17 Q And, again, working back to front, and there is a</p> <p>18 couple of screening notes, again, where the staff is</p> <p>19 looking at your record, but if we go to pages 611</p> <p>20 through 614, there is a health services admission</p> <p>21 screening.</p> <p>22 Do you have any reason to doubt that you</p> <p>23 were promptly screened for health service needs on</p> <p>24 your admission to the jail in August of 2013?</p> <p>25 A No, I do not.</p>	<p>1 had -- at the same time as page 611. Did you receive</p> <p>2 an oral health assessment?</p> <p>3 A I don't know.</p> <p>4 Q On page 607 --</p> <p>5 MS. KLEINHAUS: I guess I'd like to have a</p> <p>6 standing objection to all questions about this</p> <p>7 exhibit so I don't have to interrupt. I mean, she is</p> <p>8 obviously not any more skilled at reading medical</p> <p>9 records than anyone else. She is not an expert in --</p> <p>10 MR. RUSSART: Do you have a legal</p> <p>11 objection? Do you have a legal objection?</p> <p>12 MS. KLEINHAUS: I'm just --</p> <p>13 MR. RUSSART: I'm just trying to</p> <p>14 demonstrate to you how foolish it is when you</p> <p>15 interrupt us and make that comment, but go ahead, I</p> <p>16 want you to make a record.</p> <p>17 MS. KLEINHAUS: I'd just like to make a</p> <p>18 standing objection. She doesn't have any expertise</p> <p>19 on medical records. Go ahead.</p> <p>20 MR. KNOTT: She is making a claim that she</p> <p>21 didn't -- that there is a policy or practice of not</p> <p>22 providing healthcare at the Milwaukee County Jail, so</p> <p>23 I'd like to have her recollection as to whether, in</p> <p>24 fact, that's a truthful allegation or not.</p> <p>25</p>

<p style="text-align: right;">Page 198</p> <p>1 BY MR. KNOTT:</p> <p>2 Q Ms. Terry, do you believe it's the policy of the</p> <p>3 Milwaukee County Jail to not provide healthcare?</p> <p>4 MS. KLEINHAUS: Just object to the extent</p> <p>5 it calls for a legal conclusion, but you can answer.</p> <p>6 MR. RUSSART: Is that a form objection?</p> <p>7 MS. KLEINHAUS: No, it's an objection to</p> <p>8 the extent it calls for a legal conclusion. That's</p> <p>9 why I stated that is my objection.</p> <p>10 THE WITNESS: My answer to that question is</p> <p>11 I don't necessarily think that Milwaukee County Jail</p> <p>12 doesn't provide healthcare. I don't believe that</p> <p>13 they provide prompt emergency care.</p> <p>14 BY MR. KNOTT:</p> <p>15 Q Do you have personal knowledge of anyone's care other</p> <p>16 than your own?</p> <p>17 MS. KLEINHAUS: Objection to form. You can</p> <p>18 answer.</p> <p>19 MR. RUSSART: What's wrong with the form?</p> <p>20 What's wrong with the form so we can correct it.</p> <p>21 MS. KLEINHAUS: I'm not -- we have got to</p> <p>22 get out of here. I'm not going to do this argument</p> <p>23 with you. That's my objection, I'm entitled to make</p> <p>24 my objection, and she still has to answer, and I told</p> <p>25 her she can answer.</p>	<p style="text-align: right;">Page 200</p> <p>1 my client, so that's what I'm going to do.</p> <p>2 MR. RUSSART: Okay.</p> <p>3 MR. KNOTT: Well, to the extent it's</p> <p>4 necessary, I agree with Mr. Russart, that if there is</p> <p>5 a problem with the form, I do think you are</p> <p>6 obligated, if called out, to tell me what it is so</p> <p>7 that I can correct it.</p> <p>8 MR. RUSSART: And as long as the witness</p> <p>9 isn't here, could I hear Mr. Knott's question read</p> <p>10 back?</p> <p>11 (Requested portion of record read by the</p> <p>12 reporter.)</p> <p>13 MS. KLEINHAUS: Okay. Shall I get the</p> <p>14 witness?</p> <p>15 MR. KNOTT: Sure.</p> <p>16 (Requested portion of record read by the</p> <p>17 reporter.)</p> <p>18 MR. KNOTT: Ms. Court Reporter, could you</p> <p>19 please read back the question?</p> <p>20 (Question read aloud by reporter.)</p> <p>21 MS. KLEINHAUS: Same objection. Go ahead.</p> <p>22 THE WITNESS: I know that other experiences</p> <p>23 that I had while I was in a jail was why I was afraid</p> <p>24 to have the baby in the jail, and that's why I went</p> <p>25 on the run so that I didn't have to have the baby in</p>
<p style="text-align: right;">Page 199</p> <p>1 MR. RUSSART: We have got to go off the</p> <p>2 record here for a minute.</p> <p>3 MS. KLEINHAUS: No, I'm not going off the</p> <p>4 record. I'm not.</p> <p>5 MR. RUSSART: Well, excuse the witness.</p> <p>6 MS. KLEINHAUS: Okay. Please step out in</p> <p>7 the hallway.</p> <p>8 THE WITNESS: May I use the bathroom?</p> <p>9 MS. KLEINHAUS: Yeah, sure.</p> <p>10 (Witness excused.)</p> <p>11 MR. RUSSART: I think you know that the</p> <p>12 only two objections that are allowed at a deposition</p> <p>13 are form and foundation. And the reason is, because</p> <p>14 those can't be corrected later.</p> <p>15 So if there is a form objection, it's</p> <p>16 within the right for the lawyer to ask what's the</p> <p>17 form objection so that they can correct the form</p> <p>18 error. Foundation same thing. If there is a</p> <p>19 foundation objection, they can then lay the</p> <p>20 foundation. So because this question is important to</p> <p>21 Mr. Knott and myself, I would like to know what the</p> <p>22 form objection is so it can be corrected.</p> <p>23 MS. KLEINHAUS: I'm not required to tell</p> <p>24 you the problems that I have with the question. What</p> <p>25 I'm required to do is lodge my objection on behalf of</p>	<p style="text-align: right;">Page 201</p> <p>1 jail, because I had seen other people miscarry in</p> <p>2 jail, I have seen people fall and crack their head</p> <p>3 open in jail. These are things that I have seen.</p> <p>4 Yes, and there was people calling for help and taking</p> <p>5 all night for help to get there. These are things</p> <p>6 that I witnessed with my own eyes.</p> <p>7 So yes, I have seen this happen, where they</p> <p>8 don't get emergency medical care in an emergency, not</p> <p>9 promptly.</p> <p>10 BY MR. KNOTT:</p> <p>11 Q So your concern over the care at the jail led you to</p> <p>12 go on the run so that you wouldn't be arrested and</p> <p>13 brought to the jail; right?</p> <p>14 MS. KLEINHAUS: Objection.</p> <p>15 BY MR. KNOTT:</p> <p>16 Q That's what you said; right?</p> <p>17 MS. KLEINHAUS: Objection; mischaracterizes</p> <p>18 testimony and argumentative.</p> <p>19 BY MR. KNOTT:</p> <p>20 Q Did you not --</p> <p>21 MS. KLEINHAUS: You can answer.</p> <p>22 BY MR. KNOTT:</p> <p>23 Q Did you not say you went on the run to avoid being</p> <p>24 arrested and brought to the jail?</p> <p>25 A To have the baby in jail, yes. I -- that's -- when</p>

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<p>1 we were speaking earlier, when you were asking me did</p> <p>2 I do things in a way to avoid being arrested, and you</p> <p>3 said was it to -- so you didn't have to go to jail.</p> <p>4 And I said, no, it was so I didn't have to have the</p> <p>5 baby in jail, and that's the same thing I'm saying</p> <p>6 here.</p> <p>7 Q Okay. I want to talk to you about your own</p> <p>8 healthcare, and so far I think we have been -- this</p> <p>9 is your third admission to the jail, and I have not</p> <p>10 heard of any need that you had that was not attended</p> <p>11 to promptly in those two admissions and now we're</p> <p>12 working on the third; okay?</p> <p>13 Am I correct in characterizing the</p> <p>14 admissions, that you were given prompt attention and</p> <p>15 care for psychiatric and mental health needs in June</p> <p>16 of 2010 and May 2011; correct?</p> <p>17 A Yeah, up to everything we have reviewed, yes.</p> <p>18 Q And you have no recollection of any other needs that</p> <p>19 were -- that you had that were not addressed at those</p> <p>20 times; right?</p> <p>21 A I'm sorry, were you looking back, was that -- that</p> <p>22 was in these ones; right?</p> <p>23 Q Yes.</p> <p>24 A The mental health? Okay. Yeah, I did, within a few</p> <p>25 days of me dropping a slip they came and checked my</p>	<p>1 Do you have any reason to dispute that you</p> <p>2 were monitored for opiate withdrawal in the infirmary</p> <p>3 or SMU in August of 2013?</p> <p>4 A That's correct.</p> <p>5 Q And do you have any reason to dispute that the next</p> <p>6 line says "WHNP," which I will represent to you means</p> <p>7 "women's health nurse practitioner, appointment</p> <p>8 made." I think is what was indicated there.</p> <p>9 A Right.</p> <p>10 Q Do you have any reason to dispute that a referral to</p> <p>11 a women's health specialist was made promptly?</p> <p>12 A That -- yeah, that's what that says.</p> <p>13 Q Yes, and I think if you turn to the -- we will get</p> <p>14 there.</p> <p>15 Go to page 605.</p> <p>16 A (Witness complies.) Am I still marking these pages</p> <p>17 off?</p> <p>18 Q Yeah.</p> <p>19 A What are we at, on three?</p> <p>20 Q I think that -- in all honesty, I think that Nurse</p> <p>21 Wigley was documenting several different forms, so</p> <p>22 those were all within about an hour of you getting</p> <p>23 there?</p> <p>24 A Okay.</p> <p>25 Q So I'm going to leave that as one assessment.</p>
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<p>1 mental health.</p> <p>2 Q Dropping a slip?</p> <p>3 A Yeah.</p> <p>4 Q Okay. And you had -- let's go back to exhibit --</p> <p>5 what's the exhibit for August of 2013?</p> <p>6 MS. KLEINHAUS: 4.</p> <p>7 THE WITNESS: Okay.</p> <p>8 MR. KNOTT: Thanks.</p> <p>9 BY MR. KNOTT:</p> <p>10 Q Page 606. There is an assessment by Nurse Wigley.</p> <p>11 It says, "Inmate reports being eight weeks pregnant.</p> <p>12 Inmate reports using heroin daily."</p> <p>13 Do you have any reason to dispute that you</p> <p>14 were assessed on the day that you were arrested in</p> <p>15 August of 2013 by Nurse Wigley?</p> <p>16 A No.</p> <p>17 Q And she created a plan to deal with the fact that you</p> <p>18 were eight weeks pregnant and that had you had a</p> <p>19 potential for opiate withdrawal. Do you have any</p> <p>20 reason to dispute that?</p> <p>21 A No.</p> <p>22 Q And under plan, it says she consulted with Dr. Gable</p> <p>23 and received an order to initiate opiate withdrawal</p> <p>24 monitoring and house in infirmary for 24 hours until</p> <p>25 seen by M.D.</p>	<p>1 A Okay.</p> <p>2 Q But if you turn to page 605, you were seen at</p> <p>3 10:46 p.m. in the special medical unit by a nurse,</p> <p>4 Cheryl Wenzel. Do you see that?</p> <p>5 A Uh-huh.</p> <p>6 Q "Yes"?</p> <p>7 A Yes, I do. I'm sorry.</p> <p>8 Q Okay. And I think that's a second assessment, so if</p> <p>9 you would put a "2" there I would appreciate it.</p> <p>10 A Okay.</p> <p>11 Q And it states that the inmate is eight weeks pregnant</p> <p>12 and has been pregnant 13 times with one live birth.</p> <p>13 Is that something you said?</p> <p>14 A Yes.</p> <p>15 Q Has anyone ever explained to you why you have had</p> <p>16 multiple miscarriages?</p> <p>17 A No.</p> <p>18 Q Have you had an ectopic pregnancy?</p> <p>19 A Yes.</p> <p>20 Q Was that your first pregnancy?</p> <p>21 A No.</p> <p>22 Q Did you require surgery for the ectopic pregnancy?</p> <p>23 A I did.</p> <p>24 Q Did you ever require any other sort of gynecological</p> <p>25 procedures or surgeries?</p>

<p style="text-align: right;">Page 206</p> <p>1 A I'm sorry?</p> <p>2 Q Did you ever require any other gynecological procedures other than related to childbirth?</p> <p>3 A No. Other than related to childbirth, no. I mean, a</p> <p>4 D & C, but that's still related to childbirth;</p> <p>5 correct?</p> <p>6 Q And how often did you have that procedure?</p> <p>7 MS. KLEINHAUS: Objection to form.</p> <p>8 THE WITNESS: I guess I have had -- I don't</p> <p>9 know, at least ten times.</p> <p>10 BY MR. KNOTT:</p> <p>11 Q And those were the result of spontaneous</p> <p>12 miscarriages?</p> <p>13 A Yes. I'm sorry, ten -- no, I probably had -- sorry,</p> <p>14 I'm getting tired and frustrated, just like you guys</p> <p>15 are. Probably seven or eight times for the D & C.</p> <p>16 Q You told Nurse Wenzel that you weren't really feeling</p> <p>17 sick from heroin withdrawal at that time; correct?</p> <p>18 A Uh-huh.</p> <p>19 Q "Yes"?</p> <p>20 A Yes.</p> <p>21 Q It says you hadn't eaten for several days. Do you</p> <p>22 have any reason to doubt that that's what you told</p> <p>23 her?</p> <p>24 A No.</p>	<p style="text-align: right;">Page 208</p> <p>1 Q It looks like you were assessed at 1:14 a.m. in the</p> <p>2 SMU by a nurse on page 604; right?</p> <p>3 A I'm sorry, you said 1:14?</p> <p>4 Q Yeah.</p> <p>5 A Yes.</p> <p>6 Q And can you put a number next to that?</p> <p>7 A I was at four; right? Three? Uh-huh.</p> <p>8 Q And if you page between 603 and 604, I will represent</p> <p>9 to you that that is the nurse at 1:00 o'clock or 1:15</p> <p>10 in the morning doing a withdrawal assessment.</p> <p>11 A Uh-huh.</p> <p>12 Q And taking your vital signs. Do you have any reason</p> <p>13 to dispute that that occurred?</p> <p>14 A I do not.</p> <p>15 Q Do you have any complaint with how your symptoms of</p> <p>16 withdrawal were dealt with in August of 2013 at the</p> <p>17 Milwaukee County Jail?</p> <p>18 A No.</p> <p>19 Q On page 601, there was an assessment done at</p> <p>20 11:49 a.m. It's an assessment on August 3rd at about</p> <p>21 noon. It says you're reporting withdrawing from</p> <p>22 heroin with new symptoms. It says: Inmate reports</p> <p>23 using heroin daily, was going to the Methadone Clinic</p> <p>24 on 16th Street when arrested, had cocaine on person.</p> <p>25 Were those true statements?</p>
<p style="text-align: right;">Page 207</p> <p>1 Q It says you had chills at night and was in the ER at</p> <p>2 Wheaton and was diagnosed with UTI and STD and was</p> <p>3 given prescription for medicine, but didn't start</p> <p>4 taking it yet. Do you recall that?</p> <p>5 A Yes.</p> <p>6 Q And did you ever obtain treatment in 2013/2014 for an</p> <p>7 STD?</p> <p>8 A Yes.</p> <p>9 Q And where did you obtain that treatment?</p> <p>10 MS. KLEINHAUS: Just object to the extent</p> <p>11 that this is harassing, but go ahead and answer.</p> <p>12 THE WITNESS: I don't -- I don't remember.</p> <p>13 BY MR. KNOTT:</p> <p>14 Q The --</p> <p>15 A I mean it says here "Wheaton," but I don't remember</p> <p>16 specifically.</p> <p>17 Q The -- this to be clear, this is the pregnancy that</p> <p>18 we're talking about in this litigation; right?</p> <p>19 A Yes.</p> <p>20 Q And you were diagnosed with an STD and a UTI during</p> <p>21 the course of that pregnancy?</p> <p>22 A Right in the beginning, yes.</p> <p>23 Q So if you were recommended treatment, you would have</p> <p>24 obtained that treatment; right?</p> <p>25 A Yes. I -- yes.</p>	<p style="text-align: right;">Page 209</p> <p>1 A Yes.</p> <p>2 Q What's the Methadone Clinic on 16th Street?</p> <p>3 A I'm sorry?</p> <p>4 Q What's the Methadone Clinic on 16th Street? Do you</p> <p>5 know the name?</p> <p>6 A No. That's what I thought it was called, was the</p> <p>7 Methadone Clinic on 16th Street.</p> <p>8 Q I'm sorry, you have to be a little louder.</p> <p>9 A That's what I thought the Methadone Clinic was</p> <p>10 called. The Methadone Clinic on 16th Street.</p> <p>11 Q We haven't talked about that previously?</p> <p>12 A That was the Methadone treatment I was talking about.</p> <p>13 Q If you look at page 600 -- I'm sorry, did you put a</p> <p>14 note next to the note on -- did you put a number next</p> <p>15 to the note on 601?</p> <p>16 A (Witness complies.) Okay. And then you said</p> <p>17 page 6 --</p> <p>18 Q 600, at about 2:00 in the afternoon on August 3rd,</p> <p>19 you were given a medical evaluation by Dr. Thomas</p> <p>20 Gable. Any reason to dispute that?</p> <p>21 A No.</p> <p>22 Q And it says that you came into the facility</p> <p>23 yesterday, prior to booking seen at hospital and had</p> <p>24 ultrasound done confirming pregnancy, eight weeks.</p> <p>25 Does that refresh your recollection as to</p>

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<p>1 whether your ultrasound was done in association with 2 being booked into the jail? 3 A I -- I don't -- I mean, yeah, I had -- I don't think 4 that I had the ultrasound at jail. Is that what 5 you're asking me? 6 Q I'm not asking you -- 7 A I'm sorry. 8 Q -- if you had it at the jail. 9 I'm asking you, if when you were arrested 10 on August 3rd you were transported to a hospital in 11 order to obtain an ultrasound to confirm your 12 pregnancy at eight weeks? 13 A No, the -- the -- because it was Cudahy that 14 transported me. It was to make sure that -- because 15 I told them that I was a daily heroin user and it was 16 to make sure that -- to clear me, basically, was what 17 my understanding was why they took me to the 18 hospital. 19 Q So you were arrested in Cudahy? 20 A Uh-huh. 21 Q "Yes"? 22 A Yes. 23 Q And they took you -- the Cudahy police took you to a 24 hospital? 25 A Eventually, yes.</p>	<p>1 Q There is an assessment at 10:21 by a Nurse Bevenue, 2 B-e-v-e-n-u-e; do you see that? 3 A Yes. 4 Q Can you put a number next to it? 5 A Certainly. 6 Q Do you remember Nurse Bevenue? 7 A I do not. 8 Q Do you know if you ever interacted with Nurse Bevenue 9 at any other time? 10 A The name sounds familiar, but I don't know. 11 Q You have no reason to think that she disliked you or 12 had anything against you, do you? 13 A No. 14 Q If you turn to page -- did you put a number next to 15 Bevenue's assessment? 16 A The one that we just went over? 17 Q Yeah. 18 A Okay. 19 Q Page 597. 20 A Okay. 21 Q There is an opiate withdrawal assessment and SOAP 22 note by a nurse on August 4. Could you put a number 23 next to that? 24 A Uh-huh, yes. 25 Q If you look at page 596, I think it's the same</p>
Page 211	Page 213
<p>1 Q And did you first arrive at the Milwaukee County Jail 2 before being taken to the hospital? 3 A No, after being taken to the hospital. 4 Q So the Cudahy -- 5 A Twice. 6 Q -- Police took you to the hospital for an assessment 7 to be cleared for admission to the Milwaukee County 8 Jail; correct? 9 A I'm not sure it was to be brought to Milwaukee County 10 Jail or not. I ended up going to the hospital twice 11 while I was in Cudahy's custody. 12 Q But if this note is correct, it was one day before 13 you were seen by Dr. Gable, you had been at a 14 hospital and had an ultrasound done confirming a 15 pregnancy; correct? 16 A Correct. 17 Q So whether it was done by the Milwaukee County Jail 18 or the Cudahy Police, you had prompt attention to 19 that medical need in August 2013; agree? 20 A Agreed. 21 Q And did you put a number next to your assessment by 22 Dr. Gable on August 3rd? 23 A Okay. 24 Q And turn to page 599. 25 A (Witness complies.)</p>	<p>1 assessment, it says: I feel okay. My legs are 2 bothering me. They hurt. 3 A Yes, I see that. 4 Q Is that something that occurred when you were 5 withdrawing from heroin, that your legs would hurt? 6 A Yes. 7 Q If you look at page 594, there is an assessment by a 8 nurse named Margie Burton, B-u-r-t-o-n. If you 9 carryover from page 594 to 595, it appears that she 10 did an assessment and planning for you. 11 Do you agree? 12 A Yes. 13 Q And one of the things it says in the plan is that she 14 was going to get a request for information completed 15 and faxed to the 10th Street Clinic. Is that another 16 facility? 17 A The 10th Street Clinic would be what I was thinking 18 16th Street Clinic. 19 Q So you think those are two different facilities? 20 A No, it's the same facility. 21 Q And which one is it? 22 A 10th Street. Sorry, maybe I made a mistake or it was 23 a typo and I wasn't remembering it correctly, but now 24 that I'm seeing 10th Street, that's where it's at, 25 it's off of 10th and Layton.</p>

Page 214	Page 216
<p>1 Q Did you put a number next to Ms. Burton's assessment?</p> <p>2 A Yes.</p> <p>3 Q What assessment -- what's the number?</p> <p>4 A 9.</p> <p>5 Q Page 591, there was an opiate withdrawal assessment done by a nurse at 5:36 on August 4; correct?</p> <p>6 A Correct.</p> <p>8 Q Would you put a number next to it?</p> <p>9 A Yes. Yes.</p> <p>10 Q Thank you. Page 589, there is a nursing assessment done on August 5. Any reason to dispute that?</p> <p>12 A No.</p> <p>13 Q And I think her note carries over from 588 to 589. And it says your "stomach is cramping a little bit and my legs are a little achy." Are those both things that you experienced when you were withdrawing from heroin?</p> <p>18 A Yes.</p> <p>19 Q Yes?</p> <p>20 A Yes.</p> <p>21 Q Did you put a number next to that note?</p> <p>22 A (Witness complies.) Okay.</p> <p>23 Q Page 587.</p> <p>24 A I thought that's the page we were on. Okay.</p> <p>25 Q August 5, you were seen by Nurse Burton again?</p>	<p>1 Q And if you look at page 580, in the comments, it says: Client states she has not been on Methadone since July 1st, but found out she was pregnant at Planned Parenthood and thought she was needed to get back on because she was pregnant.</p> <p>6 Is that something that you told Nurse Practitioner Prince?</p> <p>7 A That sounds about right, yes.</p> <p>9 Q So this says you found out that you were pregnant with the pregnancy at issue at Planned Parenthood; correct?</p> <p>12 A Correct.</p> <p>13 Q And if you look at the plan under "comments," it says, "Advise the client that the writer, Pam, will call her over for prenatal visit later today."</p> <p>16 Do you remember that occurring?</p> <p>17 A I don't remember.</p> <p>18 Q In here, in her assessment, and you can look at it on page 579, it says, "The client does not want to restart Methadone."</p> <p>21 A Correct.</p> <p>22 Q You were offered Methadone in order to deal with your heroin withdrawal; correct?</p> <p>24 A Correct.</p> <p>25 Q And you elected not to have that treatment; right?</p>
Page 215	Page 217
<p>1 A Uh-huh.</p> <p>2 Q And you reported that you have no complaints?</p> <p>3 A Okay. I see that.</p> <p>4 Q Did you put a number?</p> <p>5 A I did.</p> <p>6 Q I want you to go to page 579.</p> <p>7 A (Witness complies.)</p> <p>8 Q This is a women's health note. Do you know what that means?</p> <p>9 A No.</p> <p>11 Q There is a nurse practitioner named Pamela Prince. Do you know that name?</p> <p>13 A Yes.</p> <p>14 Q Is that the women's health nurse practitioner that you referred to earlier?</p> <p>16 A It was.</p> <p>17 Q And you saw her enough where she became familiar to you?</p> <p>19 A Correct.</p> <p>20 Q And did she seem to be attentive to your needs?</p> <p>21 A Yes.</p> <p>22 Q And you understand that you were referred to her for an assessment because you were confirmed to be pregnant in August of 2013?</p> <p>25 A Yes.</p>	<p>1 A Correct.</p> <p>2 Q Did you put a number by that assessment by Nurse Practitioner Prince?</p> <p>4 A I can, yup.</p> <p>5 Q I think it starts --</p> <p>6 A Yeah, I was going to say hold on one second, let me go back, I forgot what number I was on.</p> <p>8 Q I think it starts on 579.</p> <p>9 A Okay. All right. I got it.</p> <p>10 Q And it says that she was going to -- in the earlier note it said that she was going to have you come over to the clinic for another assessment and at page 576 it appears that she did that. Do you agree?</p> <p>14 A I agree.</p> <p>15 Q Did you put a number next to that assessment?</p> <p>16 A (Witness complies.) Okay.</p> <p>17 Q Page 575, there is an assessment by Dr. Gable.</p> <p>18 A On 575 you said?</p> <p>19 Q 575 carrying over to 576.</p> <p>20 A Okay.</p> <p>21 Q Did he talk to you also about your pregnancy and whether you wanted to start Methadone?</p> <p>23 A I don't remember.</p> <p>24 Q It says that in the P section on 576, it says "Outside OB follow to be scheduled."</p> <p>25</p>

<p style="text-align: right;">Page 218</p> <p>1 Do you remember being told that an</p> <p>2 assessment by an outside OB would be scheduled for</p> <p>3 you?</p> <p>4 A No.</p> <p>5 Q Did you ever have -- were you ever transported by the</p> <p>6 Milwaukee County Jail for an outside OB assessment?</p> <p>7 A I don't think so.</p> <p>8 Q Did you put a number next to Dr. Gable's assessment?</p> <p>9 A I'm trying to find his name. You said that's on 576?</p> <p>10 Q Yes, it's the first line on 576.</p> <p>11 A Oh, I see it, thank you.</p> <p>12 Q 574, you saw Nurse Practitioner Prince again?</p> <p>13 A Okay.</p> <p>14 Q Did you put a number there?</p> <p>15 A Yes, I did.</p> <p>16 Q Also on 574, there is a reference to a Nurse</p> <p>17 Practitioner Young. And, again, I don't think she</p> <p>18 saw you.</p> <p>19 A Okay.</p> <p>20 Q Do you remember a Nurse Practitioner Young?</p> <p>21 A I don't.</p> <p>22 Q Page 573, Nurse Practitioner Prince placed a call to</p> <p>23 the Methadone Clinic to discuss you. Do you have any</p> <p>24 reason to dispute that that occurred?</p> <p>25 A I'm sorry?</p>	<p style="text-align: right;">Page 220</p> <p>1 THE WITNESS: Yes.</p> <p>2 BY MR. KNOTT:</p> <p>3 Q Do you have any needs related to your pregnancy that</p> <p>4 weren't addressed on that admission?</p> <p>5 A No.</p> <p>6 MR. KNOTT: We can go off the record.</p> <p>7 THE VIDEOGRAPHER: Going off the record at</p> <p>8 6:30 p.m.</p> <p>9 (Off the record.)</p> <p>10 THE VIDEOGRAPHER: We're back on the record</p> <p>11 at 6:32 p.m.</p> <p>12 MS. KLEINHAUS: The statements that we were</p> <p>13 making before about whether we're going to continue,</p> <p>14 our position is that we have to complete the</p> <p>15 deposition today. I told you in advance I couldn't</p> <p>16 start until noon and said you could pick another day</p> <p>17 if you wanted to start earlier, and you elected to</p> <p>18 proceed today.</p> <p>19 Our position is that it needs to be</p> <p>20 completed today. I know we have an ongoing</p> <p>21 contentious disagreement about questions related to</p> <p>22 drug use after this incident. Our position is the</p> <p>23 same, that we don't believe that that's relevant to</p> <p>24 damages, and it's something that we will have to take</p> <p>25 up with the court for a protective order.</p>
<p style="text-align: right;">Page 219</p> <p>1 Q Nurse Practitioner Prince placed a call to the</p> <p>2 Methadone Clinic to discuss you.</p> <p>3 A Okay.</p> <p>4 Q Do you recognize the name Betty Rivers, RN?</p> <p>5 A I don't recall the name, no.</p> <p>6 Q Do you have any reason to doubt that Nurse</p> <p>7 Practitioner Prince called the Methadone Clinic to</p> <p>8 discuss you, your pregnancy, and the use of</p> <p>9 Methadone?</p> <p>10 A No.</p> <p>11 Q On page 572, the first page, you were assessed for</p> <p>12 opiate withdrawal on August 5 by a nurse.</p> <p>13 A Okay.</p> <p>14 Q Did you -- could you put a number next to that</p> <p>15 assessment?</p> <p>16 A All right.</p> <p>17 Q So it looks like you were in the jail from August 2</p> <p>18 until August 5 in 2013?</p> <p>19 A Correct.</p> <p>20 Q And how many times were you seen and assessed?</p> <p>21 A Seventeen.</p> <p>22 Q Do you agree with me that that was vigilant attention</p> <p>23 to your needs on that incarceration?</p> <p>24 MS. KLEINHAUS: Objection to form,</p> <p>25 foundation. You can answer.</p>	<p style="text-align: right;">Page 221</p> <p>1 MR. RUSSART: And the court reporter off</p> <p>2 the record indicated that she has a personal</p> <p>3 commitment, family commitment, that she would like to</p> <p>4 be able to keep. And if we keep going, it's not</p> <p>5 going to happen for her. She is not going to be able</p> <p>6 to keep it. Off the record, Doug asked as a courtesy</p> <p>7 whether we could adjourn the deposition to</p> <p>8 accommodate the court reporter. And Ms. Kleinhaus</p> <p>9 said no, basically that's her problem.</p> <p>10 So -- basically. And so I think that it</p> <p>11 makes sense to adjourn the deposition. I don't know</p> <p>12 why your client couldn't be produced for the</p> <p>13 remainder of this seven hours, that we're going to</p> <p>14 take all seven hours.</p> <p>15 MS. KLEINHAUS: I just have to clarify,</p> <p>16 I -- I informed you ahead of time I couldn't start</p> <p>17 until noon. If when you booked a court reporter, the</p> <p>18 thing to do would have been to explain that this is</p> <p>19 starting at noon so it could proceed well into the</p> <p>20 evening, but it was never my intention to interrupt</p> <p>21 anyone's plans, but it's on you to book the court</p> <p>22 reporter, and I told you when I could start and I</p> <p>23 offered to do it a different day.</p> <p>24 MR. KNOTT: You didn't offer me any other</p> <p>25 days --</p>

<p style="text-align: right;">Page 222</p> <p>1 MS. KLEINHAUS: Excuse me --</p> <p>2 MR. KNOTT: You didn't offer any other days</p> <p>3 before the summary judgment deadline.</p> <p>4 MS. KLEINHAUS: You didn't ask for a</p> <p>5 deposition of our client until within --</p> <p>6 MR. KNOTT: That's not true.</p> <p>7 MS. KLEINHAUS: -- two weeks of the summary</p> <p>8 judgment deadline.</p> <p>9 MR. KNOTT: That's not true.</p> <p>10 MS. KLEINHAUS: Well, you wrote me and</p> <p>11 asked me about two dates. One was like May 31st, the</p> <p>12 other was like June 1. I said I could do June 1, but</p> <p>13 I have a doctor's appointment in the morning, so I</p> <p>14 would have to start at noon, if you want to pick</p> <p>15 another day let me know. And then I didn't hear</p> <p>16 anything. Then I followed up with you: Are we going</p> <p>17 on June 1st. Yes, we are. So that's how we're in</p> <p>18 this situation right now.</p> <p>19 MR. KNOTT: My position is it's about</p> <p>20 90 percent certain that we're going to be back here</p> <p>21 to complete the deposition after we have been given</p> <p>22 appropriate authorizations, received records, and</p> <p>23 have a ruling on the questions in which you directed</p> <p>24 the plaintiff not to answer.</p> <p>25 So I think it's a practical solution to</p>	<p style="text-align: right;">Page 224</p> <p>1 MR. RUSSART: It doesn't say one day, it</p> <p>2 says seven hours.</p> <p>3 MS. KLEINHAUS: Well, you don't get to</p> <p>4 terminate -- if your proposition were true, you could</p> <p>5 do seven days of an hour apiece, if we wanted to do</p> <p>6 it that way. We're not doing it that way.</p> <p>7 MR. RUSSART: We're not asking to do it</p> <p>8 that way, and we're proposing something that's</p> <p>9 reasonable and logical. I'm not sure that you</p> <p>10 understand.</p> <p>11 MR. KNOTT: And decent. I have got to take</p> <p>12 a break.</p> <p>13 MS. KLEINHAUS: I told you ahead of time,</p> <p>14 I'm not trying to inconvenience her. I assumed you</p> <p>15 would arrange for a court reporter that could stay</p> <p>16 into the evening given that you wanted to start at</p> <p>17 noon, and I resent the implication that I am causing</p> <p>18 this problem. I told you ahead of time I couldn't</p> <p>19 start until noon. I told you that.</p> <p>20 MR. KNOTT: Well, we lost about an hour</p> <p>21 when you instructed the witness not to answer the</p> <p>22 third question, which clearly would pertain to her</p> <p>23 damages, so I think --</p> <p>24 MS. KLEINHAUS: It is my obligation to</p> <p>25 direct her not to answer if I think something is</p>
<p style="text-align: right;">Page 223</p> <p>1 allow the court reporter to have her personal life.</p> <p>2 MS. KLEINHAUS: I'm not terminating it, but</p> <p>3 if you're terminating it, then you can say that and</p> <p>4 take that position.</p> <p>5 MR. RUSSART: You're not agreeing to</p> <p>6 reproduce her voluntarily, there will have to be a</p> <p>7 court order is what you're saying?</p> <p>8 MS. KLEINHAUS: That's right, I told you I</p> <p>9 produce her once, today's the date you picked, we're</p> <p>10 here, we're prepared to answer questions, that's the</p> <p>11 situation.</p> <p>12 MR. RUSSART: So on what authority are you</p> <p>13 relying in saying that, because I have heard that</p> <p>14 from your office so many times. On what authority</p> <p>15 are you relying that you only have to produce her on</p> <p>16 one occasion?</p> <p>17 MS. KLEINHAUS: Under the rules, you have</p> <p>18 seven hours of deposition. You asked about doing it</p> <p>19 over more than one day. We had this discussion over</p> <p>20 email. I said I'm not doing it over more than one</p> <p>21 day. I'm doing it one day.</p> <p>22 MR. RUSSART: So you don't have any</p> <p>23 authority.</p> <p>24 MS. KLEINHAUS: So Rule 30, one day of</p> <p>25 seven hours.</p>	<p style="text-align: right;">Page 225</p> <p>1 harassing and not discoverable. So you may disagree</p> <p>2 about how I'm doing it, you may take a different</p> <p>3 position, but that is my job.</p> <p>4 MR. RUSSART: We would be an hour ahead of</p> <p>5 things right now if that didn't happen I think was</p> <p>6 Mr. Knott's point. Anyway, we can go off the record</p> <p>7 so Mr. Knott can take his break.</p> <p>8 THE VIDEOGRAPHER: Going off the record at</p> <p>9 6:38 p.m.</p> <p>10 (Off the record.)</p> <p>11 THE VIDEOGRAPHER: We're back on the</p> <p>12 record. It's 6:44 p.m.</p> <p>13 MR. KNOTT: We took a break and I have</p> <p>14 probably 45 minutes to an hour from completion. The</p> <p>15 court reporter has informed us that it's not only a</p> <p>16 personal matter, but it's her own child's graduation</p> <p>17 party that we're 15 minutes from.</p> <p>18 I don't think that we're going to complete</p> <p>19 the deposition tonight, and I don't think -- and</p> <p>20 that's because we haven't been given records, and we</p> <p>21 were -- and questions clearly pertaining to damages</p> <p>22 were not answered at the instruction of counsel, so I</p> <p>23 want to -- I'm going to cease questioning and will</p> <p>24 likely have to address this with the court is my</p> <p>25 understanding.</p>

<p style="text-align: right;">Page 226</p> <p>1 I would ask for your agreement to 2 reschedule, allow us to have the records, and allow 3 your witness to answer questions pertaining to 4 damages. 5 MS. KLEINHAUS: Okay. I won't repeat 6 myself, so I think my position is clear, so we're not 7 agreeing to that. 8 MR. RUSSART: I'll correct the record -- 9 MS. KLEINHAUS: Can you just -- 10 MR. RUSSART: -- Ms. Kleinhaus was -- 11 MS. KLEINHAUS: Let me finish. 12 MR. RUSSART: -- correct that the 13 deposition is limited to one day and 7 hours. I 14 didn't know you were -- 15 MS. KLEINHAUS: Okay. When I say "let me 16 finish," that means I'm not done, but I understand 17 now we are done, and I would like our court reporter 18 to be able to go since that's your decision to 19 terminate it, so we will go off the record. 20 THE VIDEOGRAPHER: Going off the record at 21 6:45. 22 (Whereupon, the proceedings concluded at 23 6:45 p.m.) 24 25</p>	
<p style="text-align: right;">Page 227</p> <p>1 STATE OF WISCONSIN)) SS: 2 MILWAUKEE COUNTY) 3 4 I, Carla J. Van Roo, Registered 5 Professional Reporter and Notary Public in and for 6 the state of Wisconsin, do hereby certify that I have 7 carefully compared the foregoing pages with my 8 stenographic notes, and that the same is a true and 9 correct transcript. 10 I further certify that I am not a relative 11 or employee or attorney or counsel of any of the 12 parties, or a relative or employee of such attorney 13 or counsel, or financially interested directly or 14 indirectly in said action. 15 Dated at Milwaukee, Wisconsin, on this 16 _____ day of _____, 2018. 17 18 _____ 19 Carla J. Van Roo 20 Registered Professional Reporter 21 Certified Realtime Reporter 22 Notary Public 23 24 My commission expires May 15, 2019 25</p>	

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